

In the Matter Of:

UNITED STATES vs STATE OF GEORGIA

1:16-CV-03088-ELR

DERRICK GILCHRIST

September 29, 2022



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UNITED STATES vs STATE OF GEORGIA

September 29, 2022

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

United States of America,
Plaintiff,

No.
1:16-CV-03088-ELR

vs.

State of Georgia,
Defendant.

~~~~~

VIDEOTAPED DEPOSITION OF

DERRICK GILCHRIST

SEPTEMBER 29, 2022

9:07 a.m.

49 Atlanta Street

Marietta, Georgia

Marcella Daughtry, RPR, RMR  
Georgia License No. 6595-1471-3597-5424  
California CSR No. 14315

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Stacey Suber-Drake (via Zoom)  
Todd Parker, videographer

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1 THE VIDEOGRAPHER: This is the video  
2 deposition of Derrick Gilchrist in the matter of United  
3 States of America versus State of Georgia. Today's date  
4 is September 29th, 2022. The time on the record is 9:07.  
5 My name is Todd Parker. I'm the videographer. The court  
6 reporter is Marcie Daughtry.

7 Counsel, please introduce yourselves and state  
8 whom you represent, after which the court reporter will  
9 swear in the witness.

10 MS. HAMILTON: My name is Andrea Hamilton for  
11 the United States.

12 MS. GARDNER: Kelly Gardner Womack for the  
13 United States.

14 MS. JACKSON: Dasha Jackson for Derrick  
15 Gilchrist.

16 THE VIDEOGRAPHER: I just want to make sure  
17 those mics are on.

18 MR. PICO-PRATS: Javier Pico-Prats for the  
19 State of Georgia.

20

21 DERRICK GILCHRIST,  
22 called as a witness herein, having been first duly sworn  
23 by the shorthand reporter to speak the truth and nothing  
24 but the truth, was examined and testified as follows:

25 >>>

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EXAMINATION

BY MS. HAMILTON:

Q Good morning, Mr. Gilchrist. How are you doing today?

A I'm well. Thank you. Good morning. How are you?

Q I'm good. Thank you.

My name is Andrea Hamilton, and I represent the United States. I will be taking your deposition today.

Would you please state your full name for the record.

A Derrick Gilchrist.

Q I will be asking you a series of questions, and you are under oath to provide complete and honest answers to those questions. Do you understand?

A Yes, I do.

Q If you do not understand a question that I ask, you should feel free to let me know, and I'll try to rephrase the question. Okay?

A Yes.

Q If you are not sure of an answer or don't have a complete answer, you must still answer the question to the extent that you can. Okay?

A Yes.

Q If you need a break at any point, please tell



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1 me or your attorney. We will let you finish your answer,  
2 and if you are in the midst of answering your question,  
3 we'll let you complete it and then discuss when or if to  
4 break. Does that work?

5 A Yes.

6 Q As you can see, the court reporter is recording  
7 all that's said here. Because she can only record our  
8 words, we just ask that you speak clearly and answer each  
9 question with a verbal response. Do you understand?

10 A I do.

11 Q Also, I want us to avoid talking over each  
12 other. I will try to not interrupt you when you're  
13 answering, and I just ask that you do your best to let me  
14 finish whatever question that I am asking before you  
15 start to answer. Okay?

16 A Yes.

17 Q Is there any reason that you can think of that  
18 you would not be able to answer my questions fully and  
19 truthfully?

20 A No.

21 MS. HAMILTON: And I just want to note on the  
22 record that the United States, counsel for the witness,  
23 and the State of Georgia have agreed that all objections  
24 except as to form and privilege will be reserved until  
25 trial.

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1 I am handing the court reporter what I would  
2 like to have marked as Plaintiff's Exhibit 446.

3 (Plaintiff's Exhibit 446 was marked for  
4 identification.)

5 THE COURT REPORTER: Thank you.

6 (Off-the-record discussion.)

7 Q BY MS. HAMILTON: Mr. Gilchrist, you have just  
8 been handed Plaintiff's Exhibit 446. This is a subpoena  
9 to testify at a deposition in a civil action. You can  
10 take a moment to review the document, and let me know  
11 when you're finished.

12 A I'm fine.

13 Q Okay. The subpoena is --

14 MR. PICO-PRATS: Excuse me. Todd, sorry to  
15 interrupt.

16 Andrea, you're -- you're very muted. I don't  
17 know if you have a mic.

18 THE VIDEOGRAPHER: It wouldn't be -- it  
19 wouldn't be that mic. It wouldn't be that mic. He just  
20 needs you to talk louder. It may be the mask.

21 (A discussion was held off the record.)

22 THE VIDEOGRAPHER: Going off the record at  
23 9:14.

24 (The deposition was at recess from 9:14 a.m. to  
25 9:24 a.m.)

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1 THE VIDEOGRAPHER: We are back on the record at  
2 9:24, and if we can have everyone on Zoom please loudly  
3 identify yourselves.

4 MS. TAYLOE: Laura Tayloe for DOJ.

5 MS. JOHNSON: This is Melanie Johnson for the  
6 State of Georgia.

7 MR. PICO-PRATS: Javier Pico-Prats for the  
8 State of Georgia.

9 MS. EDMONDSON: Anna Edmondson for the State of  
10 Georgia.

11 MS. LEVERT: Sandra LeVert from the Department  
12 of Justice.

13 MS. CHEVRIER: Claire Chevrier for the United  
14 States.

15 Q BY MS. HAMILTON: Before we went off the  
16 record, Mr. Gilchrist, you had just been handed  
17 Plaintiff's Exhibit 446. Have you seen this document?  
18 And this was a subpoena to testify at a deposition in a  
19 civil action. The subpoena is directed to Derrick  
20 Gilchrist; is that correct?

21 A That's correct.

22 Q Have you seen this document before today?

23 A Yes.

24 Q Who showed this document to you?

25 A It was shared with me by the attorneys from

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1 Gregory, Doyle, Calhoun & Rogers.

2 Q And you're here today on account of this  
3 document; is that correct?

4 A That's correct.

5 Q The top of this document has the case name  
6 United States versus Georgia; is that correct?

7 A That is correct.

8 Q Do you understand that this deposition is being  
9 taken in connection with litigation against the State of  
10 Georgia relating to the Georgia Network for Educational  
11 and Therapeutic Support program?

12 A Yes, I do.

13 Q Are you aware that this program is commonly  
14 referred to as the GNETS program?

15 A Yes.

16 Q So if I use the term "GNETS" today, do you  
17 understand that I'm referring to the Georgia Network for  
18 Educational and Therapeutic Support program?

19 A Yes, I do.

20 Q When did you first learn about the GNETS  
21 litigation?

22 A 2015 I believe there was a -- a letter of  
23 findings that was issued.

24 Q And how did you learn about the letter of  
25 findings?

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1 A I don't remember.

2 Q Did you read the letter of findings?

3 A Yes, I did.

4 Q What is your understanding of what this case is  
5 about?

6 A The suit is against the State of Georgia in  
7 regards to the GNETS program.

8 Q And are you aware of any of the allegations  
9 that were made against the State pertaining to the GNETS  
10 program?

11 A When you say "aware of"?

12 Q Do you know what the allegations were that were  
13 made about the GNETS program?

14 A No.

15 Q I am going to ask you a few questions about  
16 your preparation for this deposition. I want to make it  
17 clear that I'm not going to ask you to reveal the  
18 substance of any communications that you had with your  
19 attorney.

20 What did you do to prepare for this deposition?

21 A Nothing.

22 Q Did you meet with counsel?

23 A No.

24 MS. JACKSON: That does call for privilege  
25 information.

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1 Q BY MS. HAMILTON: I don't want to know the  
2 substance of the communications. I just want to know if  
3 you met with your attorney.

4 A When you say "met with," I spoke with them when  
5 the subpoena was given. I asked a few questions where --

6 MS. JACKSON: You don't have to get into --

7 Q BY MS. HAMILTON: You don't have to get into  
8 substance.

9 A Oh, I'm sorry.

10 Q So --

11 A So, yeah --

12 Q -- you did meet with the attorney?

13 A I spoke with them. We did not meet  
14 face-to-face.

15 Q Who exactly did you meet with?

16 A I have not met with anyone.

17 Q I'm sorry. When you met with the attorney,  
18 which attorney did you meet with?

19 A When I spoke with the attorney, I spoke with  
20 Ms. Jackson.

21 MS. JACKSON: Again, I'm going to object on  
22 line of privilege.

23 Q BY MS. HAMILTON: Okay. And, again, I don't  
24 need to know any substance.

25 Was there anyone else present beyond the

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1 attorney during that meeting?

2 A Because it was a phone call, I'm not sure if  
3 there was others in the room with her. There was no one  
4 in the room with me.

5 Q Okay. Besides speaking with your attorney, did  
6 you speak with anyone else in preparation for this  
7 deposition today?

8 A I have not.

9 Q And in answering that question, did you speak  
10 to or meet with any GNETS directors about their  
11 experience being deposed by the United States?

12 A I did not.

13 Q Did you review any documents in preparation for  
14 the deposition today?

15 A No.

16 Q Did you bring any documents with you today to  
17 assist you with the deposition today?

18 A No.

19 Q Have you ever had your deposition taken before?

20 A Yes.

21 Q How many times?

22 A Once.

23 Q And what was the context for the deposition  
24 that you had taken previously?

25 A It was a HR issue.

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1 Q All right. An HR issue in connection with your  
2 work at the GNETS program?

3 A HR work in -- or in deposition in connection  
4 with my work with my school district.

5 Q Okay. And when was that deposition?

6 A 2019, I believe.

7 Q And the dep- -- the deposition that you just  
8 referenced is the only deposition that you've had; is  
9 that correct?

10 A That's correct.

11 Q I may be using some acronyms today for brevity,  
12 and I want to run through a few of them now to make sure  
13 that we're on the same page.

14 The first is Georgia DOE. When I use the term  
15 "Georgia DOE," will you understand that I'm referring to  
16 the Georgia Department of Education?

17 A Yes.

18 Q When I use the acronym "DBHDD," will you  
19 understand that I am referring to the Georgia Department  
20 of Behavioral Health and Developmental Disabilities?

21 A Yes.

22 Q When I use the acronym "DCH," will you  
23 understand that I am referring to the Georgia Department  
24 of Community Health?

25 A Yes.



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1 Q When I use the acronym "LEA," do you understand  
2 that I am referring to local education agency?

3 A Yes.

4 Q When I use the acronym R-E-S-A or "RESA," do  
5 you understand that to be the Regional Educational  
6 Service Agency?

7 A Yes.

8 Q When I use the term "GNETS centers," do you  
9 understand that to be the stand-alone GNETS locations?

10 A Yes.

11 Q When I use the term "GNETS school-based  
12 locations," do you understand that to be GNETS locations  
13 that are based in general education settings?

14 A Yes.

15 Q When I use the acronym "PBIS," do you  
16 understand that to stand for Positive Behavioral  
17 Interventions and Supports?

18 A Yes.

19 Q When I use the acronym "EBD," do you understand  
20 that to be emotional and behavioral disabilities?

21 A Yes.

22 Q And when I use the term "general education  
23 settings," do you understand that to be public schools in  
24 Georgia where children with EBD or any other behavioral  
25 health condition can receive instruction and services

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1 alongside kids who do not have disabilities?

2 A Yes.

3 Q I am handing the court reporter what I would  
4 like to have marked as Plaintiff's Exhibit 447.

5 (Plaintiff's Exhibit 447 was marked for  
6 identification.)

7 Q BY MS. HAMILTON: Mr. Gilchrist, you have just  
8 been handed Plaintiff's Exhibit 447. This is a copy of  
9 the resume for Derrick Gilchrist that we received on  
10 September 28, 2022 from counsel. Do you recognize this  
11 document?

12 A Yes.

13 Q What is it?

14 A It's my resume.

15 Q And is this an accurate summary of your  
16 professional and educational background?

17 A It is.

18 Q Okay. I want to walk through some of the  
19 information here.

20 What is the highest level of education that you  
21 obtained?

22 A Ed specialist.

23 Q All right. And for the ed, is it educational?

24 A Educational specialist in special education.

25 Q Okay. For the educational specialist for

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1 special education, where did you receive that from?

2 A The University of West Georgia.

3 Q Okay. When did you receive it?

4 A 2002.

5 Q And how would you describe the certification?

6 For example, was it a license, a degree, a master's?

7 A That program was a add-on for ed leadership in  
8 the area of special ed in preparation to be a director of  
9 special education.

10 Q Have you received any other graduate or  
11 professional degrees?

12 A Other than the master's degree in behavior  
13 disorders, no.

14 Q So just to make sure I do have it on the  
15 record, you have a master's degree in behavioral  
16 disorders?

17 A Yes.

18 Q Okay. And when did you receive that?

19 A 1998.

20 Q From where?

21 A West Georgia.

22 Q Okay. Where did you obtain your college  
23 degree?

24 A My undergraduate degree?

25 Q Yes.

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1 A At University of West Georgia.

2 Q And what was your major?

3 A Psychology.

4 Q What year did you receive it?

5 A '96.

6 Q Okay. And have you received any other  
7 certificates or licenses that aren't reflected on your  
8 resume?

9 A No.

10 Q Mr. Gilchrist, you are currently employed at  
11 the South Metro GNETS program, correct?

12 A I am an employee of Clayton County Public  
13 Schools.

14 Q What is your current job title?

15 A GNETS director.

16 Q Okay. And which GNETS program are you -- do  
17 you work for?

18 A South Metro GNETS.

19 Q How long have you been in that role?

20 A This is my ninth school year.

21 Q And that would place you as having started in  
22 2013; is that correct?

23 A That's correct.

24 Q And it looks like you have held several other  
25 positions in connection with the South Metro GNETS

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1 program. Before serving as the GNETS director, what was  
2 your prior position?

3 A A program supervisor.

4 Q And what was the time frame that you were in  
5 that role?

6 A From October of 20 -- 2006 to June of 2013.

7 Q At a high level, how would you describe what  
8 your job -- job responsibilities were as program  
9 supervisor?

10 A Managing, monitoring, and providing support to  
11 a specific GNET site and location.

12 Q Were you based at one specific facility?

13 A Yes, I was.

14 Q Which one was that?

15 A Initially, I was the GNET supervisor at the  
16 Flat Shoals Center in Fulton County. That center is no  
17 longer open.

18 And then I served for one year as the program  
19 supervisor at -- I can't remember the name, but it was in  
20 Atlanta. It was at APS.

21 Marshall, the Marshall Center. Sorry.

22 Q And the Marshall Center was another facility --  
23 another facility that provided GNETS services?

24 A Correct. It was for students in Atlanta public  
25 schools.

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1 Q Was it a center or a school-based location?

2 A It was a center with school-based locations.

3 Q And just to clarify, when you say it was a  
4 center with a school-based location, was it a stand-alone  
5 GNETS program, or was it in like a larger general  
6 education school?

7 A So the Marshall Center was a stand-alone  
8 center, but we also had transition sites of school-based  
9 classrooms.

10 Q And these are all GNETS-related --

11 A That's correct.

12 Q -- classrooms?

13 In your capacity as a program supervisor, did  
14 you participate in the referral process for individual  
15 GNETS students?

16 A No.

17 Q Did you participate in IEP meetings?

18 A Yes.

19 Q What was your role in those meetings as a  
20 program supervisor?

21 A Provided support for teachers and acted as  
22 program administrator.

23 Q Did you ever participate in IEP meetings for  
24 students who were being referred to the GNETS program?

25 A Yes.

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1 Q And what was your role in those meetings?

2 A Again, as a program administrator.

3 Q What did you do in those meetings in your  
4 capacity?

5 A Oftentimes, I would just provide descriptions  
6 of the program and just provide services and just an  
7 overview of the program.

8 Q As a participant in that IEP meeting for those  
9 students who were being referred, were you part of the --  
10 part of the team that made a decision as to whether the  
11 student would come to GNETS?

12 A As a member of the IEP team, I did participate  
13 as a member of the team.

14 Q And so as a member of the team, did the team  
15 make the decision about whether the student would be  
16 referred to GNETS?

17 A Yes. It's always a team decision.

18 Q Okay. So before serving as program supervisor,  
19 what other positions did you hold with the South Metro  
20 GNETS program?

21 A I was a teacher.

22 Q And what was the time frame that you were a  
23 teacher?

24 A From 1998 to 2006.

25 Q All right. And what did you teach?

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1 A Social studies.

2 Q What grade level did you serve?

3 A Middle and high school.

4 Q Which GNETS facilities did you teach at?

5 A The Flat Shoals Center.

6 Q And you're at the Flat Shoals Center the entire  
7 time as a teacher?

8 A Yes.

9 Q Prior to serving as a teacher at the South  
10 Metro GNETS program, it looks like you held some other  
11 roles as well, but just to make sure I capture this, you  
12 were with the GNETS program from 1998 until present; is  
13 that correct?

14 A With South Metro?

15 Q South Metro.

16 A Yes, that's correct.

17 Q So before working with the South Metro GNETS  
18 program, what was your role before that?

19 A What do you mean?

20 Q Where were you employed before serving as a  
21 teacher in the South Metro GNETS program?

22 A I worked as a paraprofessional for the Burwell  
23 GNETS program in Carrollton for one year as I completed  
24 my practicum for my master's in behavior disorders, and  
25 that was the 1997 to '98 school year.



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1 Q And I just want to confirm, that's not  
2 reflected on the resume, correct?

3 A That's correct.

4 Q Okay. All right. Were there any other  
5 full-time positions that you held in the education field  
6 prior to working at Burwell for a year?

7 A No.

8 Q Okay. I want to ask you about a few of the  
9 other positions listed here on your resume.

10 You noted here that you were a trainer for the  
11 Georgia Association of Homes and Services for Children.  
12 Was that a full-time or a part-time position?

13 A It was a contracted position.

14 Q Okay. A full-time or a part-time?

15 A It was contracted, so I facilitated trainings  
16 as needed on a contract basis.

17 Q Okay. And were you providing those services  
18 while you were also still working at the South Metro  
19 GNETS program?

20 A Yes.

21 Q Okay. And it looks like the time frame was  
22 2007 to 2013?

23 A That's correct.

24 Q Okay. It also looks like you were a  
25 paraprofessional at Oasis Counseling; is that correct?

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1 A That's correct.

2 Q And that was from 2009 to 2011?

3 A That's correct.

4 Q Similarly, did that position overlap when you  
5 were working with the South Metro GNETS program?

6 A Yes.

7 Q Okay. And can you just briefly explain how --  
8 how you were doing that position in addition to the South  
9 Metro position?

10 A So it was a part-time evening job providing  
11 community mental health to families. And so in the  
12 evening I would go out as a paraprofessional and provide  
13 mental health services in conjunction with or in  
14 coordination with a treatment plan.

15 Q Were any of the students that you served  
16 students in the South Metro GNETS program?

17 A No.

18 Q Were any of the students that you served in any  
19 of the GNETS programs?

20 A Not to my knowledge.

21 Q And what type of training did you need to be  
22 able to provide the support services that you just  
23 explained?

24 A Those agencies, they provided training in  
25 regard to the behavioral supports that I was providing,

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1 and it again was basically following the treatment plan.  
2 And so it was a lot of behavior modification, data  
3 collection in the home to provide supports to the family.  
4 So they did provide training.

5 Q Did the training experience that you received  
6 serving that capacity support the work that you were  
7 doing at South Metro GNETS?

8 A They were not connected in that the work that I  
9 was doing part-time was mental health, and, you know,  
10 again, it was following a treatment plan. So following  
11 a -- a regiment that was outlined by individual treatment  
12 plans.

13 Q All right. It looks like there are two more  
14 positions listed. One of them says assessor at -- at  
15 Family Intervention Specialist from 2007 to 2009; is that  
16 correct?

17 A That's correct.

18 Q What was that position?

19 A It was an assessor. I completed behavioral  
20 health assessments, which informed the level of mental  
21 health services that children would receive, and also  
22 develop preliminary treatment plans.

23 Q And were you working in this capacity during  
24 the same time frame that you were also working with the  
25 South Metro GNETS program?

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1 A Yes.

2 Q Did you -- were the positions related in any  
3 way?

4 A Which positions?

5 Q The assessor position and your job at the South  
6 Metro GNETS program.

7 A No.

8 Q Were any of the clients of Family Intervention  
9 Specialist students from the South Metro GNETS program?

10 A No.

11 Q Were any of your clients students of any GNETS  
12 programs?

13 A Not to my knowledge.

14 Q And at the time, did you use any of the skills  
15 that you attained working as an assessor for Family  
16 Interventionist Specialist while you were working at the  
17 South Metro GNETS?

18 A What do you mean?

19 Q To the extent that you had mentioned that you  
20 were looking at various -- like completing behavioral  
21 health assessments and looking at preliminary treatment  
22 plans, were any of those skill sets applied to your work  
23 at South Metro GNETS program?

24 A Well, if anything, with the students that we  
25 served at GNETS, it gave me a better understanding of

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1 mental health diagnoses. It gave me a better  
2 understanding of the -- the potential behavioral problems  
3 and the origins or the roots of the behavioral  
4 challenges. So it -- it did give me a lot more knowledge  
5 in terms of how to support our students.

6 Q Now, it looks like the last position here says  
7 assessor with S and T Assessment from June to  
8 August 2007; is that correct?

9 A That's correct.

10 Q What did you do in that role?

11 A The same as with Family Intervention  
12 Specialist. It just was a different company serving  
13 different counties.

14 Q And were you still working at South Metro -- at  
15 the South Metro GNETS program when you had this position?

16 A Yes.

17 Q Okay. And the skills that you used in this  
18 position, were they similar to the skills that you used  
19 as a family -- or at Family Intervention Specialist?

20 A Yes.

21 Q Were any of the students that you served GNETS  
22 students, or, I should say, South Metro GNETS students?

23 A No.

24 Q And were any of the students that you served  
25 again with S and T Assessment students in any GNETS

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1 program?

2 A Not to my knowledge. Those counties from S and  
3 T and also for Family Intervention Specialists were not  
4 in the counties that South Metro served. S and T was  
5 Coweta, Meriwether Counties.

6 Family Intervention Specialist was Paulding and  
7 other West Metro counties.

8 South Metro, obviously the counties are  
9 Clayton, and at the time Fulton County and also Atlanta.

10 So those families did not live in that area.  
11 They were in other parts of Metro Atlanta.

12 Q And you said you don't know if they would have  
13 been served with another GNETS program?

14 A If they were locally served, that was not  
15 anything that I was aware of.

16 Q Okay. And just to clarify, where is Oasis  
17 Counseling located?

18 A Oasis Counseling was their -- their  
19 headquarters or main office was actually here in  
20 Marietta.

21 Q Is that where you worked when you were a  
22 paraprofessional?

23 A It was primarily Cobb County and -- and some  
24 Douglas County.

25 Q When you worked as a trainer for the Georgia

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1 Association of Homes and Services for Children, where  
2 were you based?

3 A Where were they based?

4 Q Where were you based?

5 A Well, as a contractor, they -- and, again, I  
6 was facilitating trainings, so I didn't have an office or  
7 I was not on site. It was we would schedule a training,  
8 and then I would show up to their office. Their office  
9 was located downtown.

10 Q And where were the trainings typically located?

11 A Downtown in their office.

12 Q Okay.

13 A And the attendees of that training were  
14 professionals in -- in the field of -- of social  
15 services. So there were DFC -- DFCS workers, foster  
16 parents who wanted to know more about IEPs and the IEP  
17 process. So the training was specifically about  
18 informing them of the IEPs, IEP processes, and just  
19 giving them more information.

20 Q I want to turn now to discuss your current role  
21 more. What are your duties and responsibilities as a  
22 GNETS director?

23 A Monitoring program, implementation of our State  
24 strategic plan for GNETS, ensuring that we have adequate  
25 programming to support our LEAs.

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1 Q What, if any, responsibilities -- what, if any,  
2 responsibilities do you have with respect to GNETS  
3 budgeting and funding?

4 A That is part of my role in terms of ensuring  
5 that we have the programming to support our students in  
6 the LEA.

7 Q And I also note here on your resume where you  
8 say that one of your responsibilities involves liaise  
9 with Georgia Department of Education to ensure program  
10 compliance with State and federal guidelines. What do  
11 you mean by that?

12 A So attend meetings, ensure that we are in  
13 compliance with the State and federal regulations as it  
14 relates to the provision of services. And -- and so  
15 making sure that I am up to date, knowledgeable about any  
16 changes that occur so that those changes could -- could  
17 be transferred to our program.

18 Q All right. Do you meet on a regular basis with  
19 any staff from the Georgia DOE?

20 A We have monthly GNETS directors' meetings.

21 Q Do you have any other meetings on a regular  
22 basis with staff from the Georgia DOE?

23 A No.

24 Q What are these monthly GNETS -- GNETS director  
25 meetings? What happens during these meetings?



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1 A Well, they -- they discuss items on the agenda.  
2 The agenda varies, and so it is to inform GNET directors  
3 of any changes, any information that we need to know.

4 Q Who from the State DOE participates in those  
5 meetings?

6 A Vickie Cleveland is the program manager at the  
7 Department of Education, and Lakesha Stevenson as well.

8 Q Have there been any other State DOE personnel  
9 who have participated in these meetings?

10 A There have been other departments that have  
11 presented out or shared information in regards to -- in  
12 regards to information from their specific departments.

13 Q And who would be some of those individuals?

14 A I can't recall names.

15 Q Okay. If you don't remember names, what would  
16 be some of the different departments who would be  
17 represented?

18 A So teacher evaluations, that's the immediate  
19 thing that comes to mind. Many instructional -- people  
20 from the instructional department, yeah.

21 Q Who else participates besides the State DOE  
22 personnel?

23 A Other than GNET directors and State personnel?

24 Q If -- yes, if there is anyone else?

25 A That's -- that's it. So the meeting is for the

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1 GNET directors, so obviously GNET directors participate  
2 and then the two individuals that I had identified  
3 earlier, and then if there are other individuals who have  
4 agenda items, they would appear.

5 Q Okay. Are these meetings mandatory for GNETS  
6 directors?

7 A I don't know that I would say that they are  
8 mandatory.

9 Q Roughly what percentage of the GNETS directors  
10 participate in the meetings?

11 A No idea.

12 Q How frequently do you participate in these  
13 meetings?

14 A I attend monthly.

15 Q And are these meetings in person or virtual?

16 A Recently they have been virtual. For --  
17 obviously, since the pandemic, they've been virtual.

18 Q Who sets the agenda for these meetings?

19 A I don't know.

20 Q Have you ever served on the GNETS directors'  
21 executive committee?

22 A I have not.

23 Q Are you aware that there is a GNETS directors'  
24 executive committee?

25 A Yes.

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1 Q What does that committee do?

2 A I have never been on the committee, so I don't  
3 know.

4 Q Are you aware of efforts last school year that  
5 were made by the Georgia Assembly to change funding for  
6 the GNETS program?

7 A Yes.

8 Q Was that topic discussed at any of the GNETS  
9 director meetings that you attended?

10 A No.

11 Q What was your understanding of the funding  
12 changes that were being discussed the last school year?

13 MS. JACKSON: I'm going to object to form.

14 Q BY MS. HAMILTON: What was your understanding  
15 of the funding changes that were being made by the  
16 Georgia Assembly last school year?

17 MS. JACKSON: I'm going to continue to object  
18 to form.

19 Q BY MS. HAMILTON: You can still answer.

20 A I'm not sure exactly what you're asking in  
21 terms of my understanding. All I know is what I read,  
22 and that was it.

23 Q Okay. And what did you read? So --

24 A I -- I read in the proposed budget that they  
25 removed funding for GNETS.

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1 Q Okay. And did that come to fruition last  
2 school year?

3 A It did not.

4 Q Do you know whether there is any further plans  
5 to remove or change the funding stream for GNETS in the  
6 future?

7 MS. JACKSON: Object to form.

8 THE WITNESS: No.

9 Q BY MS. HAMILTON: And you also mentioned  
10 earlier that again in your resume in connection with the  
11 State Department of Education, you are in communication  
12 with them to ensure program compliance with State and  
13 federal guidelines. What federal guidelines or laws do  
14 you understand that you have to comply with?

15 A IDEA.

16 Q Are there any other federal laws that you're  
17 aware of --

18 A FAPE --

19 Q -- that you have to comply with?

20 A FAPE, FERPA.

21 (Court reporter clarification.)

22 Q BY MS. HAMILTON: Any others in the special  
23 education context?

24 A No. Those are all that come to mind.

25 Q And what about Title II of the American's

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1 Disabilities Act?

2 A Yes. Yes.

3 Q What about Section 504 of the Rehabilitation  
4 Act?

5 A I'm aware of 504.

6 Q I'm going to ask you also about some specific  
7 staff members at the State DOE to gauge if you ever  
8 interact with these individuals as part of your job  
9 duties.

10 You mentioned that Vickie Cleveland  
11 participates in the GNETS director meetings. Do you ever  
12 interact with her in any other context?

13 A No. If I have any questions, I will call her.

14 Q And are you able to reach out to her directly,  
15 or do you have to go through anyone before reaching out  
16 to her?

17 A I reach out to her directly.

18 Q What types of issues would you bring to her  
19 attention?

20 A Questions about timelines.

21 Q Anything else?

22 A No.

23 Q Would you ever reach out to her about questions  
24 related to budgeting or funding?

25 A Those timelines.

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1 Q Okay. Would you ever reach out to her with  
2 questions about the operations of your GNETS program?

3 A No.

4 Q Would you ever reach out to her with questions  
5 about placement decisions for students?

6 A No.

7 Q You also mentioned that Lakesha Stevenson  
8 participates in the GNETS director meetings. Have you  
9 ever reached out to Ms. Stevens -- to Lakesha Stevenson  
10 as part of your job duties directly for any other  
11 reasons?

12 A No.

13 Q So as GNETS director, you don't recall  
14 e-mailing her to ask questions about operations or  
15 funding or any other --

16 MS. JACKSON: Object to form.

17 Q BY MS. HAMILTON: You can answer, but I can  
18 also rephrase that.

19 Just to clarify, in reaching -- with regard to  
20 Lakesha Stevenson, you don't recall reaching out to her  
21 by e-mail or phone with any questions?

22 MS. JACKSON: Object to the form.

23 THE WITNESS: Again, generally when I reach  
24 out, it's questions about timelines, meeting dates, and  
25 those type of matters. I -- I have not e-mailed her in

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1 regards to placement decisions about students or specific  
2 matters of funding. Again, I do have questions about  
3 timelines and certain things that are occurring at DOE  
4 that we're responsible for.

5 Q BY MS. HAMILTON: Okay. So you've reached out  
6 to her about timelines?

7 A Yes.

8 Q Have you ever reached out to Shaun Owen with  
9 any questions in connection to your job duties as GNETS  
10 director?

11 A No.

12 Q Are you familiar with Shaun Owen?

13 A Yes.

14 Q Who is she?

15 A I don't know her title. She was president  
16 during our DOJ visits last year. That's when I first met  
17 her, and that's the only time that I've spoken with her  
18 or interacted with her.

19 Q And by "DOJ visits," are you referring to the  
20 site inspections conducted by the United States last  
21 year?

22 A That's correct.

23 Q Are you familiar with Wina Low?

24 A Yes.

25 Q Who is that?

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1 A I believe she's the -- the director of special  
2 ed for the State.

3 Q Okay. And how are you familiar with her?

4 A Previously she was a coordinator or a  
5 consultant or she had a different position and title with  
6 DOE. This was years ago, and so I -- I remember her from  
7 that.

8 MS. JACKSON: Could you repeat that name? It  
9 didn't come up.

10 MS. HAMILTON: Yeah, her name is Wina, W-i-n-a.

11 THE WITNESS: Ms. Low is the last name.

12 MS. HAMILTON: Spelled L-o-w.

13 THE WITNESS: Right.

14 MS. JACKSON: Okay. Thank you.

15 THE WITNESS: I don't know if it has an "e" on  
16 it.

17 Q BY MS. HAMILTON: And have you ever interacted  
18 with her as part of your job responsibilities directly?

19 A No. Well, previous -- in her previous role,  
20 she was the coordinator over SLOs, and this was eight,  
21 nine years ago, so I interacted with her then.

22 Q What is an SLO?

23 A Specific learning objective, and I do not --  
24 it's been so long, I don't -- don't even remember exactly  
25 what we were doing with it, but it was a State-based, I



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1 won't say initiative, but it was something that the State  
2 was doing.

3 Q Okay. Are you familiar with Mike or Michael  
4 Rowland or Rowland?

5 A I have never heard of that person.

6 Q Are you familiar with Matt Jones?

7 A Matt Jones, I've heard the name before, but I  
8 don't know who that is.

9 Q Are you familiar with Zelfhine Smith-Dixon?

10 A Yes.

11 Q Who is that?

12 A She was the previous director of special ed for  
13 the State.

14 Q And did you interact with her as part of your  
15 job responsibilities?

16 A Never directly.

17 Q Are you familiar with Nakeba Rahming?

18 A Yes.

19 Q Who is that?

20 A I do not remember what her title was, but at  
21 one point she was assigned to support GNETS. She oversaw  
22 the development of the State's strategic plan for GNETS.

23 Q Did you ever interact with Ms. Rahming in any  
24 capacity as part of your job responsibilities?

25 A I participated on the committee that developed

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1 the strategic plan, and so that was the -- the level of  
2 interaction.

3 Q Did you ever reach out to Ms. Rahming directly  
4 with any questions or issues related to the GNETS  
5 program?

6 A I believe I -- I did speak with her as we were  
7 developing the strategic plan with specific questions  
8 about the strategic plan itself.

9 Q Okay. And you mention -- you mentioned that  
10 you served on the GNETS strategic planning committee.  
11 What was that committee?

12 A It was just a group of directors that assisted  
13 with developing the strategic plan.

14 Q What was the time frame that you served on that  
15 committee?

16 A I want to say 2016, 2017.

17 Q And you said Ms. Rahming oversaw the committee  
18 and their work?

19 A Yes.

20 Q And just for the record, Ms. Rahming's name is  
21 spelled R-a-h-m-i-n-g.

22 THE COURT REPORTER: R-a-h-m-i-n-g. Okay.  
23 Thank you.

24 MS. JACKSON: And what was her first name  
25 again?

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1 THE WITNESS: Nakeba.

2 MS. HAMILTON: Nakeba, N-a-k-e-b-a.

3 THE COURT REPORTER: e-v-a?

4 MS. HAMILTON: b-a.

5 THE COURT REPORTER: Thank you.

6 Q BY MS. HAMILTON: What was your specific role  
7 on the committee?

8 A Just participant.

9 Q And who else was on the committee?

10 A I don't remember everyone that was on the  
11 committee.

12 Q Were all of the members of the committee  
13 serving in similar capacities?

14 A They were all GNET directors.

15 Q What was the final work product that you were  
16 working toward?

17 A What do you mean?

18 Q What documents did you-all create coming out of  
19 the committee?

20 A We created the strategic plan.

21 Q Okay. Were there any other documents in  
22 connection with that?

23 A No.

24 Q Do you meet on a regular basis with any staff  
25 from DBHDD?

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1 A No.

2 Q I'm going to ask you about some specific  
3 individuals who worked at DBHDD. Have you ever  
4 interacted --

5 Well, number one, do you know who Danté McKay  
6 is?

7 A Yes.

8 Q Who -- who is Danté McKay?

9 A I believe he's the director of the child and  
10 adolescence program at DBHDD.

11 Q Have you ever interacted with Mr. McKay as part  
12 of your job duties?

13 A Yes.

14 Q And what did those interactions look like?

15 A Well, we met to discuss how we could integrate  
16 and include formal clinical and mental health services  
17 more into our programming to support students and  
18 families.

19 Q How frequently were those meetings?

20 A We've met -- I believe we've met a total of  
21 three times over the course of two years.

22 Q Which two years?

23 A 2020 and 2021. I'm sorry. This year is 2022.  
24 So 2021 and 2022.

25 Q Thank you.

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1           When you met with him, were those meetings in  
2 person, by phone --

3           A    They were --

4           Q    -- some other?

5           A    They were virtual.

6           Q    Did anyone else participate in those meetings  
7 with the two of you?

8           A    Yes. He had two of his coordinators to attend,  
9 my lead psychologist attended, and our -- and in our last  
10 meeting I had LEA representatives from Clayton County  
11 present. And that would be the director of special ed  
12 and the director of student behavioral health and  
13 well-being. And, again, we were discussing specifically  
14 how we could better integrate mental health supports and  
15 services to support students.

16          Q    Who were the two coordinators from DBHDD --  
17 well, who were the two coordinators that you mentioned  
18 who were present?

19          A    I -- I don't remember their names.

20          Q    Okay. But they work for DBHDD?

21          A    They were from DBHDD.

22          Q    What was the outcome of those two meetings?

23          A    We -- we were supposed to meet again, but we  
24 have not rescheduled from our last meeting.

25          Q    Were any concrete plans made as a result of

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1 those meetings?

2 A No.

3 Q What did you hope would come from those  
4 meetings?

5 A That we would be in a better position to make  
6 sure students who really need mental health services have  
7 access.

8 Q Did you have specific ideas of what that would  
9 look like?

10 A Yes.

11 Q What were some of those ideas?

12 A Well, we currently are -- have a contract with  
13 a mental health provider with a CSB, one of the community  
14 service boards. And so we've integrated LPCs into our  
15 programming. And so we are able to serve students and  
16 families from a -- a mental health perspective providing  
17 clinical services.

18 And so, you know, I know -- I think within the  
19 State, you know, there is perhaps a gap with access to  
20 services for children for mental health. And so, you  
21 know, obviously, students are required to attend school,  
22 and so that's made more sense to me as being the easiest  
23 way to have access to really be able to deliver the  
24 services.

25 And so, in general, you know, again, I just

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1 wanted to try to help improve access for -- for childrens  
2 and families to receive that mental health support and  
3 service.

4 Q Which CSB do you currently have a contract  
5 with?

6 A View Point Health.

7 Q And I'll ask you some questions about that  
8 later.

9 A Yes.

10 Q But that is helpful.

11 When -- when was the last meeting that you had  
12 with Danté McKay?

13 A I believe that was in May of this year.

14 Q May of 2022?

15 A Of 2022.

16 Q Okay.

17 MS. JACKSON: And is that spelling of Danté  
18 correct?

19 MS. HAMILTON: Yes, that's correct.

20 Q BY MS. HAMILTON: Are you familiar with a woman  
21 named Monica Johnson?

22 A I've heard the name before, but I -- I believe  
23 I remember who she is, but I -- I can't recall  
24 specifically.

25 Q Okay. Monica Johnson from DBHDD?

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1 A Yes, I -- yes.

2 Q Okay. What was the context where you would  
3 have interacted with her?

4 A So as I was investigating, you know, again,  
5 opportunities to kind of integrate those services within  
6 my program, I attended a provider forum that the State  
7 puts on. She was one of the facilitators in explaining  
8 and describing mental health services for providers in  
9 the state.

10 Q Okay. What was the time frame of that provider  
11 forum?

12 A December of 2019.

13 Q And have you had any direct communications with  
14 her?

15 A No.

16 Q Okay. Are you familiar with Danielle Jones  
17 from DBHDD?

18 A No.

19 Q Are you familiar with Layla Fitzgerald from  
20 DBHDD?

21 A That's one of the coordinators that Danté -- I  
22 couldn't remember her name earlier, but when you said it.  
23 And you said Daniel, and now you are saying -- I believe  
24 her name is Danielle?

25 Q Danielle Jones.



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1 A Yes.

2 Q Okay.

3 A Yes.

4 MS. JACKSON: So that last name is Jones?

5 MS. HAMILTON: Yes.

6 THE WITNESS: And it's actually Danielle and  
7 not Daniel.

8 Q BY MS. HAMILTON: Danielle?

9 A Yes.

10 Q So just to recap, when we were talking about  
11 the meetings that you had with Danté McKay, you mentioned  
12 there were two coordinators present?

13 A Uh-huh.

14 Q One of the coordinators is Danielle Jones?

15 A Yes, and the other one was Layla.

16 Q Okay. And what were your interactions with  
17 Layla Fitzgerald --

18 A She was a --

19 Q -- otherwise?

20 A -- participant in that meeting.

21 Q Did you have any other interactions with her?

22 A No.

23 Q And Layla is spelled L-a-y-l-a and then  
24 Fitzgerald.

25 Did you meet on a regular basis with anyone

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1 from the Department of Community Health?

2 A No. I have never met with anyone from that  
3 department.

4 Q Okay. Do you meet on a regular basis with any  
5 staff from GLRS, which stands for the Georgia Learning  
6 Resources System?

7 A No.

8 Q Are you familiar with the GR --

9 A Yes.

10 Q GLRS?

11 A Yes, I am.

12 Q Did they provide any support or services to  
13 your GNETS program?

14 A They -- they do make available to not only  
15 GNETS but to the local LEAs trainings and support for  
16 implementing programs. So they do make that available.  
17 We've never taken advantage of -- of anything that they  
18 have to offer.

19 I shouldn't say that. We have participated  
20 before. ASPIRE is an example. And ASPIRE are  
21 student-led IEPs where we empower our students to sort of  
22 have ownership and to lead their own IEPs. And so  
23 several years ago ASPIRE was a State initiative, and I  
24 think it was facilitated through GLRS, and so that was  
25 something that we participated in.

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1 Q Are you familiar with the Georgia State Center  
2 of Excellence?

3 A At the -- at Georgia State University?

4 Q At Georgia State University, correct.

5 A Andrew Young, School of -- yes, I am familiar  
6 with them.

7 Q Okay. Who did you interact with from the  
8 Georgia State University Center of Excellence?

9 A Astrid Prudent --

10 THE COURT REPORTER: Ashley?

11 THE WITNESS: Astrid, A-s-t-r-i-d. Astrid  
12 Prudent was a trainer for a High Fidelity Wraparound  
13 program that I was made aware of from the University of  
14 Maryland School of Medicine, and we -- in South Metro, we  
15 started about five years ago implementing the High  
16 Fidelity Wraparound model, and the Georgia State  
17 University School of Excellence was the technical support  
18 within the state of Georgia. And so we partnered with  
19 them to help us with our implementation and to ensure we  
20 were implementing correctly.

21 Q BY MS. HAMILTON: Were there any other  
22 individuals who you interacted with from Georgia State in  
23 connection with the Wraparound program?

24 A Susan McLaren was I believe over that  
25 department that Astrid was -- was linked to.

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1 Q Are you familiar with LIPT, Local Interagency  
2 Planning Team?

3 A Yes, I am.

4 Q What is that?

5 A It's a -- a committee of -- of resources that  
6 convene or come together to figure out how they can  
7 support students and children or families in need, and I  
8 believe it is connected to the CHINS, Children in Need of  
9 Services within the state.

10 And so there are monthly committee meetings  
11 that are called. Individuals are able to present  
12 specific children or students, and the committee members  
13 are able to provide suggestions, resources of how to  
14 support students.

15 Q Do you attend these monthly meetings?

16 A I -- I don't anymore. I was -- I did attend as  
17 a program supervisor, and, you know, just with LIPT,  
18 it -- the implementation of it, it just varies in terms  
19 of knowing when the meetings are and -- and all of that,  
20 so...

21 Q Do they occur every month?

22 A They are supposed to occur every month. I  
23 can't speak to whether they do or not.

24 Q In your experience, they didn't always occur  
25 every month?

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1           A    It -- no, they did not always occur every  
2   month, because I think sometimes there were issues with  
3   the facilitators. There were times where they may not  
4   have had or there may not have been individuals to  
5   facilitate LIPT meetings, and so, obviously, with no one  
6   to facilitate, the meetings would not occur.

7           Q    Are you familiar with LEA collaborative  
8   meetings?

9           A    LEA collaborative meetings? Yes, I -- I  
10   believe I am. I believe that was an initiative started  
11   by Ms. Smith-Dixon where LEAs convene under GLRS or with  
12   GLRS facilitating to discuss local special ed issues.

13          Q    Did you participate in those meetings?

14          A    I -- I do -- I don't consistently participate  
15   in those meetings. I did at one point, but I -- I don't  
16   currently.

17          Q    And what was the time frame when you did  
18   participate consistently?

19          A    From the beginning of my time as director, so I  
20   would say from about 2013 to 2017.

21          Q    When you were a participant, what was your  
22   role?

23          A    I was just a participant.

24          Q    Are you familiar with the Interagency Directors  
25   Team meetings or IDT committee meetings?

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1 A No, I am not.

2 Q And do you participate in any other committees  
3 or working groups in your capacity as a GNETS director?

4 A No, I don't.

5 MS. HAMILTON: How are you doing? We're -- we  
6 can take a break, if you want.

7 MS. JACKSON: Yeah, I want to take a break.

8 MS. HAMILTON: Okay. We will go off the  
9 record.

10 THE VIDEOGRAPHER: Going off the record at  
11 10:27.

12 (The deposition was at recess from 10:27 a.m.  
13 to 10:40 a.m.)

14 THE VIDEOGRAPHER: Back on the record at 10:40.

15 Q BY MS. HAMILTON: All right. Mr. Gilchrist,  
16 you said you began working with the GNETS program in  
17 1998; is that correct?

18 A Or '97 in Burwell.

19 Q Okay. Burwell.

20 A '97, '98.

21 Q Okay. What were your views on the  
22 effectiveness of the GNETS programs in serving students  
23 with EBD when you first started working with the program?

24 A Well, when I first started working in Burwell I  
25 was, you know, again a paraprofessional, and -- and so I

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1 was just learning about GNETS at the time, and so I did  
2 not really have or formed an opinion.

3 However, when I started my -- my career as a  
4 certified individual as a teacher with South Metro, I was  
5 very impressed. South Metro when -- when I started  
6 working with the program in the late '90s, we -- we had a  
7 full clinical staff and team, and so that meant we had a  
8 psych- -- we had two psychiatrists, a team of  
9 psychologists, art and music therapy, and so it was just  
10 a very therapeutic program.

11 And I felt like we were highly effective  
12 with -- with supporting behavioral change and  
13 modifications for students because of the way the program  
14 was structured. I had no knowledge of any other GNET  
15 program, and so I did not have any opinion of -- of any  
16 other program. All I knew was how South Metro operated.

17 Q From your perspective, what would a successful  
18 educational experience look like for students who are  
19 currently being served by your program?

20 A All of our students, our main goal is for them  
21 to be able to transition back LRE, into a less  
22 restrictive environment, and for them to be able to  
23 graduate and to move into a postsecondary option that  
24 enables them to, one, not -- not only be a productive  
25 citizen, but for them to also be able to live a

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1 productive and -- and happy life.

2 Q I am going to talk a bit about the South Metro  
3 GNETS program structure. What counties are currently  
4 served by the South Metro GNETS program?

5 A Currently we serve Clayton County and Henry  
6 County.

7 Q Do certain facilities serve students in each  
8 county?

9 A No. Each -- each center serves the students  
10 from the LEA. So our students do not cross county lines.  
11 They are all housed and provided services within the  
12 county of residence.

13 Q Okay. So for Clayton County, what facilities  
14 serve students?

15 A The Ash Street Center.

16 Q And are there any other locations that serve  
17 students in Clayton County?

18 A Yes. We have transition sites, as I kind of  
19 mentioned earlier -- with our previous collaboration with  
20 APS, we have transition sites at traditional schools  
21 within Clayton County. So Clayton County has a  
22 center-based option, as well as transition sites within  
23 traditional schools.

24 Q What are the names of the transition sites?

25 A We're in Forest Park High School, Morrow Middle



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1 School, and Edmonds Elementary School. And so all of our  
2 students have the opportunity as they make progress  
3 toward their goals and objectives to be transitioned to a  
4 less restrictive environment to begin the process in  
5 being transitioned back to their original home school or  
6 zoned home school.

7 Q Just to make sure I understand, so Ash Street  
8 Center, that's a stand-alone GNETS location?

9 A Yes.

10 Q And then these transition sites you said are in  
11 transi- -- traditional schools?

12 A That's correct.

13 Q So of those -- let's see. Okay. So that --  
14 those were in Clayton County.

15 And then for Henry County, do you have a  
16 stand-alone GNETS center?

17 A We do.

18 Q Okay. What is that called?

19 A That is the J B Henderson Center.

20 Q Are there any transition sites in Henry County?

21 A There are not. We are collaborating and  
22 working with a LEA to establish transition sites.

23 Q For students in Henry County who are ready to  
24 transition, where would they go?

25 A Back to their home school. And so because we

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1 don't have transition sites, what we do is, you know,  
2 obviously, an IEP team will convene, and we have  
3 discussions regarding modified days where they would  
4 attend the center-based program but then would also be  
5 transitioned during the day for periods of segments in  
6 their zoned home school.

7 Q Fulton County was previously part of the South  
8 Metro GNETS program, correct?

9 A That's correct.

10 Q Why were they no longer part of South Metro  
11 GNETS?

12 A They stayed at -- because Fulton County was  
13 split.

14 MS. JACKSON: I'm just going to object to form  
15 here.

16 Q BY MS. HAMILTON: You mentioned earlier that  
17 Fulton County was previously part of your GNETS program,  
18 correct?

19 A That's correct.

20 Q Why are they no longer part of the South Metro  
21 GNETS program?

22 A They decided to go with another GNET program  
23 that was currently already serving. They were one of the  
24 few LEAs that had multiple GNETS programs, and so for  
25 consistency within their district, they wanted to just

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1 have one program.

2 Q When did that change occur?

3 A The 2019 school year was our final year of  
4 providing services in Fulton County.

5 Q And by 2019 school year, would that be the 2019  
6 through the 2020 school year?

7 A It was the '19/'20. So 2019 fall, and then  
8 2020 spring.

9 Q What was your opinion of Fulton County's  
10 departure from the South Metro GNETS program?

11 A I did not really have an opinion. I understood  
12 their rationale.

13 Q Was your program negatively impacted in any way  
14 by Fulton County's departure?

15 A I would say not.

16 MS. HAMILTON: I'm handing the court reporter  
17 what I'd like to have marked as Plaintiff's Exhibit 448.

18 (Plaintiff's Exhibit 448 was marked for  
19 identification.)

20 Q BY MS. HAMILTON: The first page of this  
21 document is Bates stamped GA00356682. This is a  
22 December 2019 e-mail chain between Derrick Gilchrist and  
23 Vickie Cleveland with the subject line, "RE: Funding  
24 Summary."

25 I'll give you a moment to take a look at this,

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1 and let me know when you're ready.

2 A I've reviewed it.

3 Q Okay. Do you recognize this document?

4 A Yes, I do.

5 Q What was this e-mail chain about?

6 A It was about changes within Fulton County and  
7 how it would impact South Metro.

8 Q I want to start by looking at the e-mail that  
9 you sent to Vickie Cleveland on December 11th, 2019.

10 This is on the second page.

11 What were you asking?

12 MR. PICO-PRATS: Sorry for interrupting. Do  
13 you have a screen share of this available or a copy that  
14 you can send over to us?

15 THE REPORTER: Who was that that was talking?  
16 Oh, Javier?

17 MR. PICO-PRATS: Yeah.

18 MS. HAMILTON: Can we go off the record?

19 THE VIDEOGRAPHER: Going off the record at  
20 10:50.

21 (A discussion was held off the record.)

22 THE VIDEOGRAPHER: Back on the record at 10:54.

23 Q BY MS. HAMILTON: Mr. Gilchrist, so I might  
24 have you repeat your answer, but in your e-mail to Vickie  
25 Cleveland dated December 11th, 2019, what were you asking

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1 Ms. Cleveland?

2 A When in terms of projecting for the future, I  
3 wanted to get an idea of when they would be able to  
4 provide me information, you know, again, referring back  
5 to a timeline of when I would have information regarding  
6 our funding because of the change. And so I just wanted  
7 to know as much information as I could in terms of when  
8 that information will be provided, because that was a  
9 pretty major change for the program, and so I wanted a  
10 better idea of -- of the potential impact and when I  
11 would have that information.

12 Q And it says here you're requesting projections  
13 regarding the impact of reducing/moving 47 students. Is  
14 that the number of students at issue?

15 A Yeah. Well, it was me having access to the  
16 information of that impact so that I could plan.

17 Q Okay. Were there 47 students who were gonna be  
18 moving from your program to the North Metro program?

19 A Not physically moving as much as the count  
20 itself being moved from the South Metro formula, if you  
21 will, so the North Metro formula. And so I wanted to  
22 know when they would be able to provide me that  
23 information because we had to plan for it.

24 Q And when you say the students were physically  
25 moving --

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1           A     Right. So they remained -- Fulton County is a  
2     school-based county, in that all of the students in  
3     Fulton County who receive GNETS services are served in a  
4     school-based program model. And so the students weren't  
5     changing schools; it was just the provider was changing.  
6     So it was moving from South Metro being able to implement  
7     our programming to them bringing in North Metro to  
8     implement whatever their programming looked like.

9           Q     Okay. Once North Metro began providing  
10    programming, would you have any other -- would you be  
11    providing services to those students any further?

12          A     Not to those students in Fulton County. We --  
13    we didn't have any additional contact or anything with  
14    them.

15          Q     Okay. All right. So if we go to the very --  
16    the last e-mail in the chain but the first e-mail on the  
17    first page of the set of pages here, I want to look at  
18    the second paragraph. What did you mean when you stated,  
19    "In the past, LEAs opting to change GNETS fiscal agent  
20    incurred the cost of the change"?

21          A     So what -- what was being discussed at that  
22    time was again them moving those student numbers from our  
23    funding formula to the North Metro funding formula, which  
24    means we would have lost funds.

25                 In the past, previously prior to this event, no

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1 changes were made to the funding formula. The LEA who  
2 initiated or opted for a change would provide funding for  
3 those services to change until the -- the student count  
4 would generate for the new program, if that makes sense.

5 Q That does.

6 And you also note here, "In the cases I am  
7 familiar with, Henry County and Atlanta Public Schools,  
8 those LEAs supported GNETS operations until funding was  
9 available" --

10 A Yes.

11 Q -- "through the student count and GNETS funding  
12 formula"?

13 A Yes.

14 Q Are those examples of what you were just  
15 describing?

16 A Yes.

17 Q Okay. After consulting Ms. Cleveland, did she  
18 confirm that your understanding was correct?

19 A No, because the question again, it really  
20 wasn't about that piece. It was really more about when  
21 they -- when would I know the results of whatever was  
22 happening. Because I was not privy to, I guess at the  
23 state level, you know, how they were going to handle it.  
24 And so really what I needed to know -- the information  
25 that I needed to know is when I would be provided with an

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1 accurate project- -- projection of funding for the next  
2 school year.

3 And the reason that that was so important is  
4 because of staffing. If there were major -- major  
5 changes to the funding formula, that would have meant  
6 that I would have had teachers and individuals under  
7 contract that the funding would not have supported.

8 And so prior to -- and if you look at the  
9 timing, this was November/December, and so this is a -- a  
10 few months before teacher contracts began to go out.

11 And so again, the -- the major thing that I  
12 needed to know is, okay, what is going to be the impact,  
13 and what is our funding going to look like with these  
14 changes?

15 Q What impact did the loss of those students  
16 ultimately have on the South Metro GNETS funding?

17 A We saw a decrease in our funding since that  
18 period. But with our LEAs, and as you see in the e-mail,  
19 Henry County is mentioned. Henry County and both Clayton  
20 County both supported and continue to support GNETS  
21 services by funding positions and providing and  
22 provisioning certain resources that allow us to be able  
23 to do things like contract with View Point and implement  
24 a High Fidelity Wraparound.

25 And so while our -- we did experience a



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1 decrease in funding, we were able to move forward with  
2 our program initiatives that were aggressive toward  
3 really implementing services to kind of provision mental  
4 health and Wraparound support for the students and  
5 families in Clayton and Henry County.

6 Q Okay. And I know we were talking earlier about  
7 e-mail communications that you've had with Ms. Cleveland.  
8 Is this an example of your outreach to Ms. Cleveland?

9 A It is. And, again, you know, it's -- it's  
10 about the timeline. You know, I need to know what our  
11 funding is going to look like, you know, when will the  
12 information be available, and, you know, whether or not  
13 they were actually going to release that information a  
14 little bit sooner than what has traditionally happened  
15 within the state.

16 Q Other than the departure of South Metro, have  
17 there been any other changes in the counties or LEAs  
18 served by South Metro in the last five years?

19 A Other than the Fulton County change? When you  
20 say the past five years, no. So we've -- for the past  
21 five years we've been serving Clayton and Henry County.

22 Q Okay. Who is the fiscal agent for South Metro  
23 GNETS?

24 A Clayton County Public Schools.

25 Q And what is Clayton County's role in its

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1 capacity as a fiscal agent?

2 A The -- our funding essentially flows through  
3 Clayton County.

4 Q How is your relationship with Clayton County as  
5 a fiscal agent memorialized?

6 A What do you mean by that?

7 Q Is there a written document that memorializes  
8 the relationship that you have with Clayton County as the  
9 fiscal agent?

10 A Well, all GNET programs have signed assurances  
11 from their fiscal agent.

12 Q And when you say "assurances," what is that?

13 A And that's the fiscal agent essentially  
14 agreeing to function as the fiscal agent for the program.

15 Q Is this a standard written document?

16 A All GNET programs use the same document, yes.

17 Q Okay. Do you have signed written assurances  
18 with every LEA that's served or just with Clayton County  
19 because it's a fiscal agent?

20 A Only with the fiscal agent.

21 Q How many students are currently served in the  
22 South Metro GNETS program for the 2022 to '23 school  
23 year?

24 A I -- I don't have that information in front of  
25 me. And, you know, we're in the midst of the school

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1 year, so I can't speak to what the totals might be at the  
2 end of the school year, and so I -- I don't know.

3 Q What's a ballpark number of how many students  
4 are currently enrolled?

5 A I would --

6 MS. JACKSON: I'm going to object to form.

7 Q BY MS. HAMILTON: Can you provide me with a  
8 ballpark or rough estimate of how many students are  
9 currently enrolled?

10 A Currently enrolled, maybe a hundred to 110.

11 Q Of that estimate of 100 to 110 students, how  
12 many would be in each county?

13 MS. JACKSON: Object to form.

14 THE WITNESS: I would say 70 students in  
15 Clayton County and approximately 40 in Henry County.

16 Q BY MS. HAMILTON: What are the grades that are  
17 currently served in the South Metro GNETS program?

18 A I believe the -- the youngest student that we  
19 currently have may be in the third grade, and so we have  
20 third through 12.

21 Q What percentage of your students in your  
22 program have a primary diagnosis of EBD?

23 A I don't know that.

24 Q Do you have a rough estimate of approximately  
25 how many?

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1 MS. JACKSON: Object to the form.

2 THE WITNESS: Yeah, there's -- I couldn't give  
3 you an estimate on that.

4 Q BY MS. HAMILTON: Does every student in your  
5 program have a diagnosis of EBD?

6 A As a -- as a primary at --

7 MS. JACKSON: Object to form.

8 THE WITNESS: I can't say that.

9 Q BY MS. HAMILTON: Do you collect data on the  
10 diagnoses of your students with disabilities?

11 A Are we talking about diagnoses or disability,  
12 the disability category?

13 Q The --

14 A Disability category?

15 Q The disability category that the students have  
16 been diagnosed.

17 A We -- we don't necessarily look at data that  
18 way in terms of their disability category, so no.

19 Q So you don't know today how many students in  
20 your program --

21 MS. JACKSON: Object to the form.

22 THE WITNESS: No.

23 Q BY MS. HAMILTON: -- have a diagnosis of EBD?

24 A No. I could not quote to you how many students  
25 have a disability category of EBD.

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1 Q Relatedly, do you know how many students in  
2 your program have a primary diagnosis of autism?

3 A Disability category, no, I don't know.

4 MS. JACKSON: Object to form.

5 Q BY MS. HAMILTON: What disability categories  
6 are prevalent among the students who were served in your  
7 GNETS program?

8 MS. JACKSON: Object to form.

9 THE WITNESS: In terms of the categories  
10 prevalent, I would say is EBD, autism, and OHI, but I  
11 don't know the breakdown of who has what.

12 Q BY MS. HAMILTON: And what do you base your  
13 knowledge of what the prevalence of those disabilities --  
14 sorry. What's the basis for your knowledge of the  
15 prevalence of those disabilities?

16 A Those are the disability categories that we see  
17 most, and that's just based on experience.

18 Q Are there records that you review to be able to  
19 glean that information?

20 A It's -- it's on the IEP, on student IEPs.

21 Q How does the total number of current students  
22 in the South Metro GNETS program this year compare to  
23 prior school years?

24 A The numbers are lower.

25 Q Why are the numbers lower this school year?

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1 A I don't know.

2 Q Do you have any reason to think that there is  
3 something like a reason behind why the numbers are lower  
4 this school year?

5 MS. JACKSON: Object to form.

6 THE WITNESS: I don't -- I don't have any  
7 information to even begin to speculate of why referrals  
8 or requests for assistance is lower.

9 Q BY MS. HAMILTON: All right. I want to now  
10 switch gears, and I'm going to show a document  
11 electronically.

12 THE VIDEOGRAPHER: Can you put it up here just  
13 so I can make sure -- oh, let me go off the record for  
14 her. Going off the record at 11:09.

15 (A discussion was held off the record.)

16 THE VIDEOGRAPHER: Back on the record at 11:10.

17 Q BY MS. HAMILTON: I am showing a document  
18 electronically that I would like to have marked as  
19 Plaintiff's Exhibit 449.

20 (Plaintiff's Exhibit 449 was marked for  
21 identification.)

22 Q BY MS. HAMILTON: This is a student enrollment  
23 spreadsheet from the 2021 to '22 school year produced by  
24 the South Metro GNETS program in response to the United  
25 States subpoena to produce documents which was initially

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1 issued in August of 2021.

2 Mr. Gilchrist, I have shared my computer screen  
3 with you to give you a moment to scroll through the  
4 document. Let me know when you're ready.

5 A I'm ready.

6 Q Okay. One thing that I want to note at the  
7 outset is that you will see that there are redacted  
8 columns in this spreadsheet, and I will just click to  
9 show you an example where it's in black. These columns  
10 are redacted by the United States because they contain  
11 information such as student name, ID, date of birth, so  
12 it was redacted to protect student confidentiality and  
13 privacy. Otherwise, this is a document that was  
14 provided.

15 A Uh-huh.

16 Q Do you recognize this document?

17 A Yes, I do.

18 Q Okay. What is it?

19 A It's an Excel sheet of our student enrollment.

20 Q Okay. Am I correct that this is a document  
21 that was produced in response to the United States  
22 subpoena?

23 A Yes.

24 Q Did you assist in the creation of this  
25 document?

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1 A Not the creation, but I provided the document.

2 Q Okay. And did you review it before it was  
3 produced to the United States?

4 A I -- I do review our -- our Excel sheet  
5 periodically, so I did review it.

6 Q Okay. Can you confirm that the spreadsheet was  
7 accurate as of the time it was produced to the United  
8 States?

9 A Yes, it appears to be accurate.

10 Q Okay. So I want to walk through the  
11 spreadsheet together, and, as we noted, this will pertain  
12 to enrollment for the 2021 through the 2022 school year.

13 A Okay.

14 Q All right. The first tab here is labeled Total  
15 Student Count SY 2021 to -- and I believe this should say  
16 2022, correct?

17 A That's correct.

18 Q Okay. There are two charts on this page. I  
19 want to look at this first chart. At the time the  
20 spreadsheet was produced, is it correct that there were  
21 87 total students enrolled in the South Metro program?

22 A That's correct.

23 Q Of those 87, how many were enrolled in the Ash  
24 Street Center?

25 A 45.



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1 Q Okay. How many were enrolled in the CCPS  
2 Outposts?

3 A 16.

4 Q And how many were enrolled in Henry?

5 A 26.

6 Q And just to clarify, the CCPS Outposts, are  
7 those -- these the Clayton County transition sites that  
8 you referenced earlier?

9 A Yes.

10 Q And Henry, is this the Henry County GNETS  
11 center?

12 A Yes.

13 Q Which is also known at the J B Henderson  
14 Center?

15 A Yes.

16 Q What is the difference between the first chart  
17 that has 87 total students listed as being enrolled  
18 compared to the second chart?

19 A The first chart has current enrollment at that  
20 time.

21 The second chart was the totals, including all  
22 students, including students who had been withdrawn up to  
23 that period of time.

24 Q Okay. So in the second chart, does that mean  
25 that 16 students withdrew from CCPS or Clayton County who

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1 are not included in that total of 87 --

2 A Yes.

3 Q -- in the other chart?

4 A That's correct.

5 Q And then for the Henry Center, does this mean  
6 that 12 students withdrew from that location, and they  
7 are not included in that count of 87?

8 A That's correct.

9 Q Okay. What are the typical reasons that a  
10 student will withdraw from a -- from your GNETS program?

11 A The same reason that any student would withdraw  
12 from a -- a school system or school. Families move and  
13 relocating. So there's not like a special set of reasons  
14 of why students withdraw from GNETS.

15 Q All right. Let's move on to the next tab  
16 labeled "Ash Street Center."

17 A Okay.

18 THE COURT REPORTER: Astrid Street, is that  
19 A-s-t-r-i-d?

20 THE WITNESS: A-s-h Street.

21 THE COURT REPORTER: Oh, Ash Street.

22 THE WITNESS: Yes.

23 THE COURT REPORTER: Thank you.

24 Q BY MS. HAMILTON: And as noted earlier, the  
25 columns here that have been redacted are GTID, student

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1 number, student name, and DOB for date of birth.

2 A Okay.

3 Q But you-all did include a total at the bottom  
4 of the page, and that says that 45 students were  
5 currently being served for the Ash Street Center; is that  
6 correct?

7 A That's correct.

8 Q And there is also a notation here highlighted  
9 in yellow that says, "Pending transition to outpost  
10 classes." We're not actually able to see which students  
11 that applied to, but what would that notation be  
12 referring to?

13 A Students who are being considered to transition  
14 LRE.

15 Q And for students to be able to transition to  
16 the LRE -- and what does LRE stand for again?

17 A Less restrictive environment.

18 Q For students to be able to transition to the  
19 LRE, do they have to meet certain exit criteria?

20 A Well, they have to show progress towards their  
21 IEP goals and objectives to a point where an IEP team  
22 will convene to determine that the student is -- is  
23 prepared or has the skills necessary to function in an  
24 environment with -- with less support.

25 Q Are you involved in that process of making a

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1 decision of whether a student can transition?

2 A No. As a -- as director, I -- I don't sit in  
3 IEP meetings. So it -- it would primarily include the  
4 family, district representatives, individuals from our  
5 staff, receiving school. So it -- it would be the team  
6 of individuals that does not include me.

7 Q Who from your staff participates in those  
8 meetings?

9 A Generally the teacher participates. We have  
10 our social workers who participate, and then we have a  
11 program administrator who would participate.

12 Q And by "program administrator," who -- who  
13 would that person typically be?

14 A Whoever is the coordinating supervisor or  
15 administrator of the classroom that the student is in  
16 would be the administrator assigned to a team.

17 Q You mentioned earlier when you served as  
18 program supervisor that you would sometimes sit on the  
19 IEP team meeting?

20 A Yes.

21 Q Is that person the equivalent of the program  
22 supervisor?

23 A That's correct.

24 Q If a program supervisor isn't available, have  
25 you ever sat in?

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1           A    No. We've never had situations where they're  
2   not available. If one is not available, then -- because  
3   we have multiple coordinating supervisors, then the other  
4   individual would sit in.

5           Q    It looks like the next four columns here are  
6   labeled "Go-IEP, FTE 1, Go-IEP, FTE 2." What are those  
7   columns intended to show?

8           A    I'm not sure. And the spreadsheet that I've --  
9   that I have, I don't believe it has those columns. But  
10   "Go-IEP" is the IEP platform, and FTE 1 and 2 are the FTE  
11   count periods, and so I'm not sure with those columns  
12   what they refer to.

13          Q    Okay. And just to be clear, those columns were  
14   included in what was provided to us.

15          A    Okay. All right.

16          Q    It sounds like you don't know why it says  
17   false, though?

18          A    Right. And as I --

19          Q    Okay.

20          A    -- indicated before, I didn't create. My  
21   program evaluator is the individual who creates these,  
22   and so I didn't create it, but, you know, again, I do  
23   monitor and view it.

24          Q    Okay. With regard to the grades served, the  
25   youngest student listed here for Ash Street Center is --

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1 actually, let me scroll all the way up.

2 And you have the ability to adjust this.

3 A Uh-huh.

4 Q The youngest student who is listed here is a  
5 first grader; is that correct?

6 A That is the grade of the youngest student  
7 listed at the time, yes.

8 Q Okay. And it appears the oldest student was in  
9 12-plus grade; is that correct?

10 A Yes.

11 Q What does -- what does it mean for a student to  
12 be in grade 12-plus?

13 A The student is repeating the 12th grade.

14 Q All right. The next column is labeled EXC.  
15 Does that stand for exceptionality?

16 A Yes.

17 Q Okay. And it appears that there are disability  
18 categories that are listed here. I know earlier you said  
19 it wasn't clear if you-all tracked this data.

20 A Well, I said that I didn't know --

21 Q Okay.

22 A -- you know, the percentages or how many  
23 students --

24 Q Uh-huh.

25 A -- you know, had a disability category of EBD,

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1 autism.

2 Q Okay. Based upon the information in the  
3 spreadsheet that your program provided, is it accurate to  
4 say that the most prevalent disability category at the  
5 Ash Street Center is EBD?

6 A In reviewing this information, yes.

7 Q What other disability categories are  
8 represented among the students who you were serving  
9 during the 2021 to '22 school year at the Ash Street  
10 Center?

11 A I see SDD and TBI with speech as -- I think it  
12 included a secondary disability care -- category.

13 Q And what do those acronyms stand for?

14 A Speech language impairment, traumatic brain  
15 injury, and SDD escapes me.

16 Q And you -- again, you have control over it.  
17 You can scroll up and down.

18 A Okay. Okay. And autism; OHI, other health  
19 impairment; mild intellectual disability, moderate,  
20 severe.

21 Q Are those disability categories consistent  
22 across your various program sites?

23 A I wouldn't say -- like some of the ones like  
24 the TBI and the traumatic brain injury; the severe  
25 intellectual disability, SID, I would not say those are

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1 consistent. Those are really more outliers, as well as  
2 MOID.

3 THE COURT REPORTER: MOID? M-O- --

4 THE WITNESS: M-O-I-D.

5 THE COURT REPORTER: Thank you.

6 Q BY MS. HAMILTON: So based on what you just  
7 said, is it accurate to say that the ones that are most  
8 prevalent would be EBD followed by perhaps autism?

9 A Yes.

10 Q Okay. All right. And then looking at the last  
11 column, it's titled "Tier Level." What is that referring  
12 to?

13 A So we triangulate our student data to make a  
14 determination of what tier they are on, and so our tiers  
15 are aligned to services.

16 And so, for example, a student whose data  
17 reflects that they are Tier III, there is a certain level  
18 of -- or certain services that we provision for Tier III.  
19 For example, our Tier III students get individual therapy  
20 time with a social worker. We also do a referral to the  
21 ITS program that I was mentioning earlier that we -- that  
22 we facilitate in conjunction with View Point Health for  
23 therapy. And so it's just a way of us tiering the  
24 services that we offer for our students.

25 Q And it appears there is Tier Level I, II, and



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1 III; is that correct?

2 A That's correct.

3 Q Are there any other tiers?

4 A No.

5 Q Why do some students not have a tier level  
6 listed?

7 A If -- if they were a move-in student, they may  
8 have not been there at the time that we tiered. We -- we  
9 perform our triangulation of data twice a year, in  
10 December at the end of the first semester, and then again  
11 April/May at the end of second semester. And so any  
12 student who did not have a tier reflected either moved in  
13 at a period of time where they were not enrolled with us  
14 during our triangulation period.

15 We also previously did not triangulate the data  
16 for our students with autism, and so they were not  
17 necessarily assigned a -- a specific tier. We just --  
18 with our autism students, they were automatically  
19 considered Tier III, and they would receive the full  
20 extent of services that we have.

21 Q And just to make sure I'm clear, when you're  
22 referring to the tiers, is this part of any particular  
23 program? So, for example, I know PBIS has tiers,  
24 multi-tiered systems. MTSS has tiers. When you say  
25 "tiers," is it part of any particular program?

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1           A    It is not a part of any particular program.  
2   However, the State does ask that we triangulate our  
3   student data and take a look at our student data to make  
4   sure that we understand and know where they're  
5   functioning. And so, to my knowledge, each program has  
6   created their own tier based on the services that they  
7   have available.

8           Q    Okay. And is there a specific assessment that  
9   you use to determine what tiers the students fall under?

10          A    So we -- we basically -- a team convenes so  
11   that they can review student -- a school team convenes so  
12   that they can review the student data in terms of the  
13   number of referrals. It looks -- looks at their  
14   attendance, any discipline records, and then also they  
15   consider their percentages or progress toward meeting  
16   their IEP goals and objectives. And from there they sort  
17   of use that information to determine a tier placement.

18          Q    Okay. All right. We'll come back to this more  
19   later, but we'll keep working through the spreadsheet for  
20   now.

21                   Let's look at the next tab. It's labeled  
22   "Outpost Clayton." And it notes here that there were 16  
23   students who are currently being served in the 2021 to  
24   '22 school year, correct?

25          A    Yes.

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1 Q All right. Are these the 16 students who we  
2 discussed earlier were in the -- I think it was labeled  
3 "CCPS Outposts"?

4 A Yes.

5 Q And those are the transition sites, correct?

6 A Yes.

7 Q For Clayton County?

8 A Yes.

9 Q Looking at the grades, it appears the students  
10 served in these Clayton County transition sites ranged  
11 from grades 4 through 12; is that correct?

12 A Yes, that's correct.

13 Q And looking at the exceptionality category, it  
14 appears that the vast majority of the students listed  
15 here had a disability category of EBD; is that correct?

16 A That's correct.

17 Q All right. Looking at this first column where  
18 it says "Site," is it correct to say that each one of  
19 these sites had somewhere between four to six students  
20 each?

21 A Yes, that's correct.

22 Q Okay. So at each site, how are students  
23 grouped in their classes?

24 A Can you -- what do you mean?

25 Q Sure.

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1           So, for example, the students at Edmonds  
2 Elementary School --

3           A    Uh-huh.

4           Q    -- are all of those students grouped together  
5 in the same class?

6           A    Yes, they are.

7           Q    Does that mean that the 4th, 5th, and 6th  
8 graders are all served together?

9           A    Yes.

10          Q    Okay. And just to make sure I'm understanding,  
11 so for Forest Park High School, does that mean that the  
12 9th, 10th, 11th, and 12th graders are all served together  
13 in the same place?

14          A    Yes. And -- and if I can clarify, so when we  
15 say "served together," the GNET classroom serves as sort  
16 of their homeroom. One of the advantages of having a  
17 transition site or outpost location is that those  
18 students are able to go out to other teachers for  
19 classes. And so at all locations, the students, their  
20 homeroom teacher, their caseload manager is -- is the  
21 GNET teacher, but they are able to transition away from  
22 the GNET classroom to take classes away from -- from  
23 GNETS and -- in other classrooms within those buildings.

24          Q    Do you know how many segments of the school day  
25 these students spend outside of the classroom designated

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1 for GNETS?

2 A It would vary based on the -- the individual  
3 student. It would just kind of vary based on where --  
4 where they are in terms of their progress.

5 But across the board, what we do start off with  
6 as a baseline for all students is that at all three  
7 levels they at least take their specials, their  
8 electives, or I'm just trying to think of the third. I  
9 know specials is elementary. Middle school is -- I can't  
10 remember what they call the electives type, but they at  
11 least start off with two segments out, and then based on  
12 their progress, they are within the building, they're  
13 able to add additional electives.

14 Q Who determines when a student can transition to  
15 take more classes in the transition site?

16 A Again, it's similar to the triangulation  
17 interior process. The school teams, they meet, and they  
18 discuss progress toward IEP goals and objectives, and  
19 they just consider the performance of the student, of how  
20 the student has been since he has been at that transition  
21 site, and they make a determination as a team of what the  
22 student is ready for.

23 Q This last column with the tiers, most of the  
24 students listed here appear to be at Tier I, but there is  
25 at least one student at Tier II and two students at Tier

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1 III; is that correct?

2 A That's correct.

3 Q So the students at Tier II, let me rephrase  
4 this.

5 For your students at Tier II, are they also  
6 able to take classes at these transition sites in general  
7 education settings with nondisabled peers?

8 A Can you say that one more time?

9 Q Sure.

10 So for the Tier II student who is listed  
11 here --

12 A Uh-huh.

13 Q -- this is a student who is at the outpost  
14 transition site, correct?

15 A Correct.

16 Q Is the student in the GNETS classroom all day?

17 A Because he is Tier II?

18 Q By virtue of being Tier II.

19 A No. The tier placement does not inform or have  
20 any bearing on their ability to take classes out.

21 You know, again, the tiers are more about the  
22 services that we provide to the student in terms of  
23 whether they get art, music therapy, whether they're  
24 eligible for equine therapy. Whether -- you know, it --  
25 it just informs what we provide to them.

1           So it doesn't really speak to the types of  
2       classes that they're taking at the transition sites. All  
3       of the students at the outpost or transition sites are  
4       eligible to take classes away from the program regardless  
5       of what their tier placement is.

6           Q    Okay. So in theory, since I know we don't have  
7       the names here --

8           A    Yes.

9           Q    -- a student that has a Tier II designation at  
10      an outpost site can take classes that are not  
11      GNETS-specific classes?

12          A    Correct. Because, again, you know, for us, any  
13      time we transition a student to an outpost or transition,  
14      we like to start off with at least the electives or  
15      specials -- connections is what it is -- are their  
16      connection classes out from GNETS.

17          Q    And the students are able to receive all of the  
18      interventions that are available at the Tier II level  
19      here at the outpost location?

20          A    We're able to push in a majority of them.  
21      There may be some that we may not be able to do at  
22      outpost.

23                For example, like when we are starting equine  
24      therapy, so a student at outpost may not be able to  
25      participate in equine therapy just based on them being in

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1 a traditional school and having that schedule that  
2 doesn't necessarily permit for them to be able to go to  
3 the center where we do equine therapy.

4 Q And by "equine therapy," are you referring to  
5 horses?

6 A Yes.

7 Q Relatedly for Tier III, are those students who  
8 are at the outpost locations able to access the  
9 interventions and services that are typically available  
10 through your GNETS program for Tier III?

11 A Yes. And so, you know, I think the example I  
12 gave earlier with Tier III students is they're able to  
13 have individual sessions with our social workers and also  
14 with our -- our contract therapists, and so those  
15 therapists go out to the schools to provide those  
16 individual sessions there on-site.

17 Q All right. Moving to the next tab "LRE  
18 Clayton," what -- what does that mean? What is this tab  
19 intended to cover?

20 A So this is where we -- we like to keep track of  
21 students who are -- have transitioned to a less  
22 restrictive placement, but at the time last year of this  
23 request, we had not transitioned any students because I  
24 think the request, as you stated, came like in August or  
25 September.



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1 Q And there actually was one student listed here.

2 A And that may -- may have been a student who was  
3 at the end of the previous school year.

4 Q Okay.

5 A That was -- was denoted here. That may have  
6 been an error.

7 Q Okay. Just to make sure I understand the  
8 difference between this and the last tab that we looked  
9 at, this -- a student who is listed on this chart as LRE  
10 student, is that different from a student who is at one  
11 of the outpost or transition sites?

12 A No.

13 Q Do you understand why there would have been two  
14 different tabs?

15 A Yes, and actually, I can clarify.

16 Q Okay.

17 A And so to answer your previous question, the  
18 answer is yes. What this tab is actually for are for  
19 students who have been transitioned back to their home  
20 school.

21 Q Okay.

22 A So where you see there, that student is  
23 actually at Morrow High School, and so we track those  
24 students because we do -- when our students are able to  
25 go back to their home school, we provide reintegration

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1 supports, which means our social worker and a team from  
2 our program actually track those students back at their  
3 home school.

4 And so in reading this now, this student was  
5 able to be exited from GNETS back to their -- their zone  
6 school of Morrow High School.

7 Q Okay. So at the time of our request, you had  
8 one student who exited the GNETS program from the  
9 Clayton?

10 A At that time, yes.

11 Q Okay. And what is the significance of the  
12 start date and end date columns?

13 A I'm assuming that was when the student was  
14 transitioned. That -- that is the start date of when the  
15 student was transitioned and began their placement in  
16 that -- in that less restrictive environment. And the  
17 end date is when we would end our reintegration support  
18 that was provided by our team.

19 Q All right. Moving to the next tab labeled  
20 "Clayton Reintegration," what does Clayton reintegration  
21 mean?

22 A What I was just speaking of in terms of the  
23 student being reintegrated.

24 Q Okay. How is this tab different from the LRE  
25 Clayton tab that we were just looking at?

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1           A    They added -- they've added that FTE1 and FTE2,  
2   and so I'm not sure what -- what the differences are in  
3   those two tabs.

4           Q    There are no students who are listed in this  
5   tab --

6           A    Correct.

7           Q    -- for the 2021/2022 school year?

8           A    Correct.

9           Q    The next tab is labeled "Transferred." What  
10   does transferred mean? And, actually, the full title  
11   says "Transferred (Returned Center Based)  
12   Students-Clayton."

13          A    So it looks like students who are in the  
14   transition site, you know, again, they were placed there  
15   based on progress that was made in the center. And so  
16   there are times where students are able to go to the  
17   outpost classrooms and they have behavioral challenges or  
18   problems, and the IEP team reconvenes and determines the  
19   student's not ready, and then at that point they return  
20   back to the center.

21          Q    And it looks like there was one student for  
22   Clayton who was returned back to the center. The reason  
23   listed here says, "BX concerns-IEP Team Determination."

24                  What does that mean?

25          A    There were behavioral concerns, and the IEP

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1 team made the determination.

2 Q What support or services are typically offered  
3 before a student is transferred back to the GNETS center?

4 A At the transition site?

5 Q Yes.

6 A I would say that the staff that -- that we  
7 assigned to our transition sites are -- are able to  
8 provide behavioral support. They are able to support the  
9 needs of the students specifically. And so there's --  
10 there IS not like special supports that are provided  
11 there at the transition sites, other than what we have  
12 built into our programming for our transition sites.

13 Our students who are assigned out into those  
14 transition sites, they -- they still receive art and  
15 music therapy. Those therapists push into those school  
16 sites, so they still receive those services that a  
17 center-based student might receive. And so with students  
18 going to a less restrictive environment, the supports  
19 are -- are -- are less because they are in a transition  
20 site for LRE.

21 Q When you say a student has been returned to a  
22 center, does that concern you?

23 A Yeah, it does, for a lot of reasons, you know,  
24 especially on behalf and out of concern for the student  
25 to figure out, you know, what was going on at that

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1 transition site for them to have to return. And that's  
2 where Wraparound, mental health, all of those things come  
3 into play in terms of supporting students, because  
4 sometimes there are issues beyond our scope of -- of  
5 understanding or knowing that may either be happening at  
6 home or in the community. But with -- with Wraparound  
7 and the mental health supports, it gives us a better,  
8 more complete picture of what's going on with the  
9 student.

10 But I absolutely do become concerned when  
11 students have to return.

12 Q Let's look at this next tab. It is titled "Ash  
13 Street Center - Clayton Withdrawals (Includes Outposts)."

14 Are these the -- well, at the bottom it says  
15 there are 16 Ash Street withdrawals. Are these the 16  
16 students that we discussed at the very beginning who  
17 withdrew from the Ash Street Center?

18 A Yes, that's correct.

19 Q There is a column here listed as "Reason."  
20 What are the reasons that students withdrew, generally?

21 A You see -- and I can't see the top columns  
22 because it's a little -- okay. Never mind. I moved it.

23 We had some students who graduated, some  
24 students who changed school systems from Clayton to  
25 another, some students who were withdrawn due to

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1 attendance issues and concerns. We have some students  
2 who were hospitalized. Some incarcerated and some moved  
3 out of state. Some moved again out of county.

4 Attendance.

5 And so you see various reasons, and then you  
6 also see a student who dropped out of school.

7 Q For the students listed here as graduated, do  
8 these students graduate from the GNETS program?

9 A No. All of our students graduate from their  
10 home, their zone school, and they participate -- if the  
11 family and if they choose to, they participate in the  
12 graduation ceremony at their -- at their zone school.

13 Q What type of diplomas do the students who  
14 graduate from your GNETS program earn?

15 A Special ed or general diplomas. It just -- it  
16 varies based on the student and what -- what type of  
17 curriculum they are following, whether they are on the  
18 adaptive curriculum or the general curriculum.

19 Q For the 2021 to '22 school year, what was the  
20 breakdown of students who received the regular diploma  
21 versus the special education diploma?

22 A Since it's not listed here, I don't -- I don't  
23 know.

24 Q Do you have a rough estimate of what that  
25 breakdown --

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1 MS. JACKSON: Object to form.

2 Q BY MS. HAMILTON: -- typically would be?

3 A No, I don't want to guess at it.

4 Q Would you say all of your students receive  
5 regular diplomas?

6 A No.

7 MS. JACKSON: Object to form.

8 THE WITNESS: I would not say that all.

9 Q BY MS. HAMILTON: So there is some -- there is  
10 some combination of students who receive regular diplomas  
11 and some who receive special education diplomas?

12 A Yes.

13 Q One of the reasons that you noted is listed  
14 here for students withdrawing is because they moved to  
15 another school district. Are students automatically  
16 enrolled in another GNETS program when they leave your  
17 program?

18 A I think they are enrolled in a receiving school  
19 system based on what the -- what services are listed in  
20 their IEP.

21 Q Does that equate to automatically being  
22 enrolled in another GNETS program?

23 A If at the time of -- of withdrawal that they  
24 have GNETS services on their IEP, and so then when they  
25 enroll into another school, I would imagine those school

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1 systems would enroll them into a GNET program based on  
2 their current IEP.

3 Q I also note here that there is a student who  
4 was hospitalized. How common is it that you would have a  
5 student who is placed in a residential treatment facility  
6 or hospital?

7 A It's -- it's pretty common. The types of  
8 students who would serve in our program do have severe  
9 behavioral health challenges, as well as mental health  
10 issues. And so it's -- I think it's pretty common that  
11 our students are either hospitalized or placed in a  
12 residential facility just based on what's going on within  
13 the community, probably more so than what's happening at  
14 school. But, you know, it's pretty common.

15 Q All right. Moving to the next tier -- I'm  
16 sorry, the next tab, this one is labeled "JB Henderson -  
17 Henry County Students." And it appears there is 26  
18 students who were served during that 2021 to '22 school  
19 year; is that correct?

20 A That number is actually at current enrollment.  
21 That wasn't the total number of students served during  
22 the year.

23 Q Okay.

24 A And so at the time that this document was  
25 produced, that was the number of students at that point



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1 in the school year.

2 Q Okay. Did that number change as the school  
3 year went on?

4 A I would imagine so.

5 Q Do you know if it increased or decreased?

6 A Well, it couldn't decrease, because once we  
7 served them, but I would imagine that it would have  
8 increased due to either moving students or students who  
9 were placed within the program.

10 Q What were the grades -- what was the range of  
11 grades that were served at this point in time for the J B  
12 Henderson Center?

13 A I see grades 3 through 12.

14 Q And how would you describe the breakdown of the  
15 disability categories or exceptionalities among Henry  
16 County students?

17 A Well, we serve EBD, autism, OHI, MID students.

18 Q And, again, you should feel free to scroll up  
19 and down if you can't see the full screen.

20 A And -- and one MOID student.

21 (Court reporter clarification.)

22 Q BY MS. HAMILTON: Under -- the J B Henderson  
23 Center in Henry County serves students at all three tier  
24 levels?

25 A Yes.

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1 Q All right. Let's go to the next tab.

2 This tab is titled "J B Henderson - Henry  
3 Reintegration Students," and there is one student listed  
4 here. And it also looks like it says school WHS. What  
5 does it mean that you had one Henry County student who  
6 was reintegrated?

7 A At the time that this document was produced,  
8 there was one student who had transitioned back to their  
9 zoned school.

10 Q And, to be clear, earlier you had noted that  
11 Henry County does not have a transition or outpost site.  
12 Is that --

13 A That's correct.

14 Q -- correct?

15 A Yes.

16 Q Okay. All right. Let's look at the next tab,  
17 "Henry Withdrawals." And it says there are 12 students  
18 who withdrew. Are these the 12 Henry County students  
19 that we discussed earlier who had withdrawn from the  
20 GNETS program?

21 A Yes, that's correct.

22 Q Okay. And what are the reasons that these  
23 students withdrew from the program?

24 A We had a -- a death of a student, a student  
25 transitioned to home school, lack of attendance, a

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1 student who moved out of county, a student who  
2 transitioned to home school. A student moves out of  
3 state. Another home school student, out of district, out  
4 of state. A student transitioned back to -- to their  
5 zoned school, and then a student who was expelled from --  
6 from school.

7 Q For the instance listed here where the reason  
8 is listed as death, did the student's death occur at  
9 school or in any connection -- have any connection to the  
10 school?

11 A No. It occurred during the summer when school  
12 was out of session. It occurred within the community,  
13 and it was not related to the program or our school.

14 Q Another reason that you noted that's listed  
15 here is expulsion. Does GNETS expel students?

16 A No. The student was referred to the LEA for  
17 their discipline processes, and a determination was made  
18 that that student infraction was not one manifestation of  
19 their disability and that the LEA made the determination  
20 for that.

21 Q All right. And let's look at the last tab  
22 here. It is labeled "SMP Returned Withdrawals - Clayton  
23 and Henry County." What does "SMP Returned Withdrawals"  
24 mean?

25 A We do have sometimes where students will move

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1 outside of our program, but then they might return. And  
2 so apparently at this time we did not have any students  
3 who were previously -- previously with us to withdraw and  
4 then also to return.

5 Q All right. Thank you. I'm going to stop  
6 sharing my screen. And if you need to move that, feel  
7 free to move the computer again.

8 A All right. Thank you.

9 Q All right. So switching gears a bit, is  
10 transportation provided for students who attend the South  
11 Metro GNETS locations?

12 A Yes.

13 Q Who provides that transportation?

14 A The LEA.

15 Q What is the typical length of a student bus  
16 ride for students in your program?

17 A I don't know.

18 Q Do you have a rough estimate of how long your  
19 students spend on the bus?

20 MS. JACKSON: Object to form.

21 THE WITNESS: No, I don't.

22 Q BY MS. HAMILTON: Who from your program would  
23 have knowledge of information related to transportation  
24 and bus routes?

25 A The transportation department in each LEA.

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1 Q Is there anyone in the GNETS program who would  
2 monitor that information?

3 A The length of bus rides for students, no.

4 Q As a GNETS director, would you have concerns if  
5 you had students who were riding the bus more than an  
6 hour and a half a day?

7 MS. JACKSON: Object to the form.

8 THE WITNESS: Yes.

9 Q BY MS. HAMILTON: Would you have any way of  
10 finding out how long -- like if you have students who are  
11 riding the bus for those lengths of time?

12 A The transportation department.

13 MS. JACKSON: Object to form on that one, too.

14 Q BY MS. HAMILTON: Has the transportation  
15 department ever raised any concerns with you regarding  
16 the length of the bus routes?

17 A No.

18 Q You don't currently know if you have students  
19 who could be riding the bus more than 90 minutes a day?

20 MS. JACKSON: Object to form.

21 THE WITNESS: No, I don't have any information  
22 about the length of bus rides for students, and we've  
23 never received any complaints.

24 MS. JACKSON: If we could take a break, I see  
25 his food has arrived.

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1 MS. HAMILTON: Okay. Can we go off the record?

2 THE VIDEOGRAPHER: Going off the record at  
3 11:57.

4 (The deposition was at recess from 11:57 a.m.  
5 to 1:00 p.m.)

6 THE VIDEOGRAPHER: We are back on the record at  
7 1 o'clock.

8 Q BY MS. HAMILTON: Mr. Gilchrist, do you review  
9 data regarding the average length of time that students  
10 are enrolled in the South Metro GNETS program?

11 A No.

12 Q Does your program collect data regarding the  
13 average length of time that students are enrolled in the  
14 South Metro program?

15 A No.

16 Q Is that data that you would find helpful in  
17 understanding how to serve your students?

18 MS. JACKSON: Object to form.

19 THE WITNESS: I don't think so because progress  
20 toward behavioral changes, mental health status are so  
21 individualized. Looking at data in terms of average  
22 length of -- of placement, I don't think that would be  
23 useful because that is such an individualized kind of  
24 perspective or thing.

25 Q BY MS. HAMILTON: Earlier in the deposition we

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1 were looking at one of the GNETS centers, and there had  
2 been one student who had transitioned to a general  
3 education setting. Do you remember that?

4 A Yes.

5 Q In that program, do you have concerns that you  
6 don't have more students transitioning?

7 MS. JACKSON: Object to form.

8 THE WITNESS: No. Based on when -- when that  
9 data was generated, with it being at the beginning of the  
10 school year, that period of point in time doesn't  
11 necessarily concern me.

12 Q BY MS. HAMILTON: How many students typically  
13 transition during a school year?

14 A It varies, you know, just based on students and  
15 their individual progress.

16 Q And earlier in the deposition you had mentioned  
17 one of the main goals of your program was for your  
18 students to be able to transition back to the L- -- to  
19 the LRE. How do you know if you're meeting that goal?

20 A I think based on just our -- our review of the  
21 students that we have, and, you know, from year to year  
22 what has transpired during that school year is kind of, I  
23 guess the perspective that would lend -- lend itself to,  
24 you know, a determination of whether or not we've kind of  
25 met what we've -- we've set out to do. We don't

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1 establish a number or a percentage or -- or anything like  
2 that in terms of being a metric for our success.

3 You know, again, we look at each case on an  
4 individual case-by-case basis.

5 Q Does your program keep attendance records of  
6 what students attend every day?

7 A Both of the LEAs that we serve utilize the  
8 Infinite Campus student information system platform, and  
9 so all student attendance is recorded there. And so just  
10 like with any other student in either of those LEAs,  
11 their attendance information and data is stored there.

12 Q Do you review this information?

13 A We -- we don't review student attendance unless  
14 it becomes a problem based on each of the LEAs'  
15 attendance policies.

16 Q And you mentioned that it goes into this  
17 information system. Who -- are there any State agencies  
18 that receive that data through the system?

19 A With Infinite Campus, I'm not sure who has  
20 access to it. That is just the platform that each of  
21 those LEAs is using. So, we -- we're just using the  
22 platform that the LEAs use for all of their students.

23 Q Do you ever discuss the attendance data with  
24 anyone from the State DOE?

25 A No.



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1 Q Do your attendance rates affect funding that  
2 you receive from the State DOE in any way?

3 A To my knowledge, attend- -- attendance rates  
4 does not impact funding.

5 Q Does the number of students enrolled in the  
6 program affect funding?

7 A The total number of students served does impact  
8 the funding.

9 Q But, just to be clear, if you had, for example,  
10 a 60 percent attendance rate, that would not directly  
11 impact your funding?

12 A To my --

13 MS. JACKSON: Object to form.

14 THE WITNESS: To my knowledge, it doesn't.  
15 I -- I don't know.

16 (Court reporter clarification.)

17 Q BY MS. HAMILTON: Earlier when we were looking  
18 at the spreadsheet, I had asked you if your program has  
19 any standard exit or transition criteria for your  
20 program. And if I recall correctly, you don't have  
21 specific exit criteria; is that correct?

22 A Not specific exit criteria. I believe it's in  
23 alignment with all students in the state with IEPs. You  
24 know, their progress and placement of services and  
25 programs is dependent upon their IEP goals and

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1 objectives.

2 MS. HAMILTON: I'd like to have the court  
3 reporter mark this document as Plaintiff's Exhibit 450.

4 (Plaintiff's Exhibit 450 was marked for  
5 identification.)

6 Q BY MS. HAMILTON: You have just been handed  
7 Plaintiff's Exhibit 450, and this document is titled  
8 "Guidance and Planning Document for Student Reintegration  
9 from South Metro GNETS to LRE in Clayton County and Henry  
10 County." This is a document that we received from the  
11 South Metro program in response to the United States  
12 subpoena.

13 Do you -- if you need a minute to look at it,  
14 feel free and let me know when you're ready.

15 A No, ma'am, I don't.

16 Q Do you recognize this document?

17 A Yes, I do.

18 Q What is it?

19 A It's the document that we use to kind of  
20 outline reintegration processes for students who are in  
21 our program.

22 Q Okay. Who created this document?

23 A It was actually taken from a template that was  
24 provided by the Department of Education.

25 Q And did you receive any guidance from the State

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1 Department of Education in the form of training related  
2 to how to implement or use this form?

3 A There was not a specific training related to  
4 reintegration.

5 Q If you turn to the second page, you will see a  
6 chart that is labeled "Student Reintegration Flow Chart."

7 Do you see that?

8 A Yes.

9 Q And at a high level, can you just explain to  
10 us, what is the process for a student who is being  
11 reintegrated?

12 A So when -- when students make progress toward  
13 mastering the IEP goals and objectives that are within  
14 their IEP, IEP teams are convened to review the student  
15 data, information and progress and to make a  
16 determination of whether or not the student is -- is  
17 ready to transition.

18 As we discussed earlier, Clayton County has the  
19 option of transition sites to transition students LRE,  
20 and then Henry County has the -- the option of convening  
21 to discuss modifying the day for the student to return  
22 back to their home school.

23 Q All right. And it looks like the fourth one  
24 here says, "The IEP team establishes new goals and  
25 objectives and complete the student's reintegration

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1 plan."

2 On this next page there is a document titled  
3 "Student Reintegration Plan." Is this what is being  
4 referred to?

5 A Yes, ma'am.

6 Q Okay. Who completes this form?

7 A Generally, the -- the case manager will develop  
8 and create this plan in the actual meeting, so it's not  
9 something that's done beforehand, with input from the IEP  
10 team members to include their input of what supports may  
11 be needed or necessary for a student to be re- --  
12 reintegrated.

13 (Sneezing.)

14 THE WITNESS: Bless you.

15 Q BY MS. HAMILTON: Are there any scenarios where  
16 a student would be reintegrated in one of these  
17 transition sites and be in the GNETS classroom for the  
18 entire school day?

19 A There -- there could potentially be a situation  
20 or a scenario where a student may not have those  
21 connections, specials or electives out.

22 Q What would be the reason for that?

23 A It could be concerns with student transitioning  
24 within the building. It could be -- I guess in general,  
25 it could be something related to the actual performance

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1 of the student.

2 Q Can a student's integration into these other  
3 classes change during the time that they're at the  
4 transition site?

5 A Yes.

6 Q And earlier you had mentioned that most, if not  
7 all, of the Tier I, Tier II, and Tier III supports in the  
8 GNETS program can be available to students when they're  
9 in the transition locations; is that correct?

10 A Yes.

11 Q I want to turn back to this first page, and if  
12 you look at the second to last bullet point, it starts  
13 with, "If necessary."

14 A Uh-huh.

15 Q It reads, "If necessary, inform community  
16 agencies/mental health providers of the student's  
17 transition into a less restrictive setting to ensure  
18 there is no gap in mental health services."

19 It then goes on to say, "ACES (CCPS only) and  
20 Apex providers should be included in the reintegration  
21 process for students receiving mental health services at  
22 South Metro GNETS."

23 Can you explain generally what the expectation  
24 is for the provision of services for these community  
25 agencies and mental health providers?

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1 A Can you kind of restate that or?

2 Q Sure. I'm just trying to better understand  
3 what this bullet point is saying.

4 So what is the expectation when you're saying  
5 inform the agencies and providers? What are you  
6 expecting them to be doing?

7 A Well, the expectation is that the services are  
8 not disrupted and that the services continue as they were  
9 assigned while they were in the center. And so we expect  
10 for our therapists to provide provisional services for  
11 the student no matter where they are.

12 Q So the services that would have been available  
13 in the South Metro GNETS centers would also be available  
14 in the transition locations?

15 A They would push into, yes, those transition  
16 sites.

17 Q Okay. What is ACES, A-C-E-S?

18 A That is an acronym for the -- the mental health  
19 program that was in Clayton County, and it actually has  
20 been renamed Sparks. And that is a collaboration between  
21 the LEA with DBHDD and community mental health providers,  
22 in addition to the GNETS therapist.

23 So there is a pool of therapists that the  
24 district is able to refer students who need mental health  
25 services and support through what was formerly called

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1 ACES into now what is called Sparks.

2 Q Okay. And your -- can your program refer GNETS  
3 students to receive services through ACES, now known as  
4 Sparks?

5 A Yes. And, again, our therapists are actually a  
6 part of the pool of therapists, so we provision those  
7 services as part of that model, so we're a part of the  
8 Sparks model. So, yes.

9 Q Okay. So even -- just to make sure I  
10 understand, do your students in the GNETS centers also  
11 have access to the therapists who are part of the ACES or  
12 Sparks program?

13 A I think probably a better way of saying it is  
14 that the Sparks program model has access to our  
15 therapists. Our therapists obviously because they are  
16 integrated within our program, they serve our students  
17 through our ITS program, which is intensive therapeutic  
18 supports, but we also partner with the LEA to provision  
19 and to provide access to our therapists through MTSS, RTI  
20 for other students in the county with our therapists  
21 through the FTS, which is a flexible therapeutic supports  
22 model.

23 And then we also on a consult basis provide  
24 support to special ed students who are not assigned to  
25 GNETS, again, the same services through CTS, which is our

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1 consultative therapeutic support. So we're actually  
2 supporting the entire district with our therapists.

3 Q Okay. And I'm gonna just make sure I have all  
4 of these acronyms correctly.

5 So you said ITS, that's intensive therapeutic  
6 support?

7 A And that is strictly for students who are  
8 enrolled in a GNET program.

9 Q And is that the same as the Wraparound program  
10 that you mentioned earlier?

11 A It's separate.

12 Q That's separate.

13 (Court reporter clarification.)

14 Q BY MS. HAMILTON: And then you also mentioned  
15 MTSS. What does that stand for?

16 A Well, MTSS/RTI is where the FTS supports come  
17 into play. So through the -- the MTSS/RTI process,  
18 they're able to resper- -- refer through a Sparks model  
19 to the GNET therapist to receive mental health services.

20 Q Okay. And what do those stand for? MTSS?

21 A Multi-tiers of student support.

22 Q And RTI?

23 A Response to intervention.

24 Q And then FTS?

25 A Flexible therapeutic supports.



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1 Q And we're gonna come back to these in a -- in a  
2 moment, but I just want to make sure I have the acronyms  
3 correct.

4 And then in your reintegration guidance you  
5 also mentioned Apex providers. What is Apex?

6 A I don't know what the acronym Apex stands for,  
7 but it is a -- a State program where mental health  
8 providers are integrated into schools.

9 Q And how is this different from Sparks or ACES?  
10 Is it different because it's a State program?

11 MS. JACKSON: Object to form.

12 THE WITNESS: It's -- it's not different  
13 because they're not comparable. Apex is actually just  
14 the program that allows Sparks to bring in certain  
15 therapists.

16 Q BY MS. HAMILTON: Are students in your GNETS  
17 program able to access Apex services when they're being  
18 re- -- reintegrated?

19 A Because we have our own therapists, we have not  
20 attempted to refer through Apex. And that's, you know,  
21 primarily because we have our own therapists.

22 Q Do you know whether Apex services are available  
23 to GNETS students?

24 A I don't have any information or knowledge about  
25 that.

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1 Q Have you ever used Apex services for students  
2 in your GNETS centers?

3 A No.

4 Q If you can turn to the third page of this  
5 exhibit, there is a row listed here -- basically, this  
6 shows -- it says, "Services or resources from GNETS or  
7 LEA to support the student throughout the reintegration  
8 period," and then there is several rows that give  
9 examples of the services.

10 The last row says, "Behavioral/SEL supports,"  
11 and we're going to talk more about what each of these are  
12 individually later. But I just want to confirm, with all  
13 of the supports listed here, are all of these services or  
14 resources available to students who are being  
15 reintegrated?

16 A They are available -- they are available to --  
17 to those students who are being reintegrated through GNET  
18 staff and personnel.

19 Q Okay.

20 A And also the staff and personnel that are  
21 within the school.

22 Q And then on the next page, the very last row  
23 says "Community Supports," and it lists Wraparound  
24 services, mental health provider, Apex, LIPT, psychiatric  
25 services. I know you said a moment ago you-all aren't

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1 using Apex. That aside, are all of these other community  
2 supports available to students who are being  
3 reintegrated?

4 A Yes.

5 Q What are your views on providing students with  
6 school-based mental health services in schools?

7 A To me, it makes sense to make available to  
8 students to -- to families mental health services through  
9 school systems. I feel like it's a more wholistic  
10 approach that lends itself to yielding better, greater  
11 results with helping children who are struggling with  
12 mental illness. And so I -- you know, I support a model  
13 where those services can be effectively integrated.

14 Q And you've mentioned a number of times that the  
15 South Metro GNETS program implemented a Wraparound  
16 program, correct?

17 A Yes.

18 Q What does the term "Wraparound" mean?

19 A It's a program that provides supports in all  
20 areas of a student, of their -- of their life. And so  
21 essentially pretty much wrapping around supports that are  
22 able to impact the student or the child, not only during  
23 the school day, but beyond school day and into the  
24 community.

25 Q How did the South Metro Wraparound program come

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1 into existence?

2 A I attended a conference. Again, I referenced a  
3 conference that I attended at the University of Maryland,  
4 where they highlighted the -- the model, the High  
5 Fidelity Wraparound model, and it made sense. It made  
6 sense to me based on previous experience in terms of what  
7 I had observed and seen within the community as a mental  
8 health provider part-time in the evening, understanding  
9 and knowing the challenges that, you know, students face  
10 in regards to family dynamics. I know parents struggle  
11 sometimes when you talk about children or students who  
12 have high levels of needs.

13 And so it made sense to me to have a greater  
14 impact and to be more effective with sort of what we were  
15 doing within our program that we -- we implement this  
16 program to help support the families with meeting the  
17 needs of the students.

18 Q When was the South Metro Wraparound program  
19 started?

20 A I -- I want to say 2016/2017 school year.

21 Q Did any other GNETS programs have a similar  
22 Wraparound program at the time?

23 A No, not to my knowledge.

24 Q What was the original purpose of the Wraparound  
25 program at your -- in your program?

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1           A    When you say "the original purpose," what do  
2   you mean?

3           Q    Did you have specific goals or a vision for how  
4   the program would operate?

5           A    The main thing with the High Fidelity  
6   Wraparound model is that there is -- and the reason why  
7   Georgia State provides technical support is that it's a  
8   model that is very specific with the criteria of how it's  
9   supposed to be implemented.

10           So the primary thing that really attracted me  
11   to that model was the -- the family involvement piece  
12   where within the Wraparound model, our Wraparound  
13   coordinators or providers would develop a family  
14   treatment plan or a family team plan and bring all of the  
15   services and supports that are necessary to effectively,  
16   you know, support a student or a family to the table and  
17   to assign them specific roles that could be followed,  
18   discussed, monitored for progress. And so it was just  
19   really more of a structured, formalized way of sitting  
20   down and providing support.

21           And so, again, with knowing that our parents  
22   sometimes struggle managing all the different components  
23   and pieces that are -- that either may be in place or  
24   services and resources that they don't know about or  
25   don't have access to but they need, it just made sense to

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1 me to create a -- a situation or an environment where  
2 everyone could be at the table having conversation  
3 working from one plan, again from a wholistic view on  
4 serving and supporting students and families.

5 Q Do you have any other goals or objectives in  
6 implementing the program?

7 A Essentially, you know, the -- the overarching  
8 and the main goal is really just to be able to create a  
9 system that looks at children and students and families  
10 as a whole and to reduce some of the barriers between the  
11 inner agency divisions that occur, you know, mental  
12 health, DBHDD is separate from DOE, you know, which is  
13 kind of separate from the Social Services network.

14 And so there are gaps or a disconnect in that  
15 all agencies don't always operate from the same sheet of  
16 music, if you will. And so the goal is really just to  
17 create a more seamless wholistic approach to supporting.  
18 And so that was what the -- the initial kind of vision  
19 and goal was.

20 Q In creating the program, did you have any goals  
21 of improving student outcomes?

22 A Absolutely. And so with that wholistic  
23 approach, the thought is that, you know, you would  
24 improve academic performance, improve attendance, improve  
25 family functioning, improve impacts on the community, and

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1 just the -- from a -- from a broader perspective, just  
2 the outcomes for -- for children.

3 Q You mentioned earlier that View Point Health  
4 was involved in the program; is that correct?

5 A Yes.

6 Q What is View Point Health?

7 A They are a Community Service Board.

8 Q And what is a Community Service Board?

9 A I -- I'm probably not the person to define or  
10 describe what the CSBs are and how they operate, but  
11 essentially they're a service provider that provides  
12 various mental health services to the -- to the local  
13 community.

14 Q Okay. Why did you partner with them  
15 specifically?

16 A Because we -- we had partnership and a linkage  
17 when we started off with Wraparound. There are two CMEs  
18 in the State of Georgia that actually are sanctioned to  
19 provide and support the High Fidelity Wraparound model.  
20 And so we began our partnership through the High Fidelity  
21 Wraparound model, and we just kind of expanded from there  
22 into adding therapists and beginning the whole process of  
23 integrating the therapists within our program.

24 Q And what was their specific role in rolling out  
25 this program?

1           A    They essentially collaborated with us on  
2   providing us direct access to therapists who their  
3   full-time job, duty and responsibilities are aligned with  
4   serving the students that we refer through our ITS, FTS  
5   and CTS, and so that's all that they do. They don't have  
6   other responsibilities or assume or take on other cases  
7   outside of what South Metro provides them with.

8           And, again, with partnering with them, it sort  
9   of gives us a broader perspective of challenges, mental  
10   health issues, treatment plan processes, just being able  
11   to serve and support students.

12           Our staff has access to some information, not  
13   all information in regards to their treatment, but the  
14   information that they do have access to helps them in a  
15   classroom setting be able to support the students.

16           And it's also -- we -- we use them also in the  
17   -- in the scope of professional learning and development,  
18   and so they generally provide professional development  
19   opportunities and explaining to our staff certain mental  
20   health diagnoses, what those diagnoses may look like  
21   within children, how it may externalize itself in a  
22   school setting.

23           And it's just, you know, across the board is  
24   kind of giving us a better understanding just of the  
25   mental health diagnoses that our students have. And it's



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1 just a tool that we use to -- to inform our staff,  
2 because at the end of the day, the staff are really the  
3 important people in supporting in the day-to-day  
4 operations or -- or perspective. And so they provide  
5 those professional development opportunities as well.

6 Q How many therapists and other staff does View  
7 Point Health provide to your program?

8 A Well, right now, they're -- they only provide  
9 the four therapists that we have.

10 Q Has that number changed over time?

11 A No. It's been the same since we started.

12 Q When you began the Wraparound program, I  
13 believe you mentioned that you also work closely with the  
14 Center of Excellence for Children's Behavioral Health at  
15 Georgia State University; is that correct?

16 A So they provided us -- at the initial stage of  
17 implementation, they provided us with the technical  
18 assistance with our implementation of it, and so we don't  
19 currently have a MOU or contract with them beyond that  
20 initial stage.

21 Q Okay. When you say technical -- "technical  
22 assistance," what did that include?

23 A So they trained us on the processes, the steps.  
24 They trained us on what High Fidelity, what the High  
25 Fidelity model was. They monitored, sort of, our

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1 activities. I referenced earlier the family team plan.  
2 They just monitored to make sure we were operating and  
3 implementing with Fidelity.

4 And then they also administered a -- a family  
5 survey at the end of the -- the Wraparound period for  
6 each family to just gather data and determine -- make  
7 determinations of family perspective and, you know, what  
8 they thought about it.

9 Q How is your Wraparound program funded?

10 A Currently, we're funding it through our -- our  
11 grant, through the grant for GNETS.

12 Q And when you say "grant for GNETS" --

13 A So --

14 Q -- I'm not familiar with --

15 A So -- so, you know, we receive a State and  
16 federal grant, and so that -- that program, that position  
17 now is funded through our grant.

18 Initially, View Point, at no cost or no charge,  
19 provided us with the Wraparound coordinators. And so  
20 there was no initial cost to implementation initially.

21 Q How did View Point Health cover the expense of  
22 being able to provide coordinators to you-all at no  
23 expense?

24 A I don't know.

25 Q Okay. And how long were they able to provide

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1 coordinators at no expense to your program?

2 A I believe that -- that lasted for four school  
3 years.

4 Q Since that point, you've been using the State  
5 GNETS grant funding to cover the costs?

6 A Yes. Our grant funds, yes.

7 Q Are those funds at any GNETS program that  
8 have -- that could be put toward these purposes?

9 MS. JACKSON: Object to form.

10 THE WITNESS: So all -- all programs receive  
11 the same grants. It's up to the directors to sort of  
12 build that within their budget, and so we've been able to  
13 do that.

14 Q BY MS. HAMILTON: So to make sure I understand,  
15 some -- some of the funding is discretionary, and you've  
16 been able to put that funding toward the Wraparound  
17 program?

18 A I --

19 MS. JACKSON: Object to form.

20 THE WITNESS: I wouldn't call it discretionary.  
21 You know, we receive funds to secure staff, and so part  
22 of the staff that I elected to spend funds on were the  
23 Wraparound coordinator.

24 MS. HAMILTON: I'm handing the court reporter a  
25 document that I would like to have marked as Plaintiff's

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1 Exhibit 451.

2 (Plaintiff's Exhibit 451 was marked for  
3 identification.)

4 Q BY MS. HAMILTON: Mr. Gilchrist, Plaintiff's  
5 Exhibit 451 has a title of "South Metro GNETS and View  
6 Point Health High Fidelity Wraparound." This is another  
7 document that the United States received from the South  
8 Metro program in response to our subpoena.

9 Do you recognize this document?

10 A Yes.

11 Q What is it?

12 A It's a description of our High Fidelity  
13 Wraparound program.

14 Q When was this document created?

15 A I -- I believe it was created when we initiated  
16 the program.

17 Q When would that have been?

18 A 2016/2017 is what I remember as being the first  
19 year.

20 Q Okay. So I want to talk through in more detail  
21 what the steps -- talk through the steps of the  
22 Wraparound program. So I'd like to turn to the second  
23 page. This is called the Collaborative Wraparound  
24 Flowchart --

25 A Yes.

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1 Q -- for South Metro GNETS and View Point Health.

2 So the first section, it looks like, it's  
3 talking about the referral process. Can you just  
4 summarize for us, what is the process for which a student  
5 gets referred to the Wraparound program?

6 A Well, it used to be -- it used to be before we  
7 had the internal staff. Now because they're an employee  
8 with us, it's a little bit different.

9 But, essentially, a student is identified as a  
10 potential candidate for Wraparound and could benefit, you  
11 know, again, through our data triangulation. And so this  
12 is a Tier III support that we offer.

13 Once the student is identified, the social  
14 worker, in conjunction with View Point Health, would  
15 reach out to the family, explain and describe the program  
16 to them, and ask them if they were interested in  
17 participating. And so, you know, families would either  
18 select to participate or they would decline.

19 Q Was it an option for all students receiving  
20 Tier III level services?

21 A Yes.

22 Q Was it ever provided to students who were  
23 receiving Tier II or Tier I services?

24 A Yes. We -- we -- we could and would refer out  
25 for students at other tier levels just based on and

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1 identify a need.

2 Q All right. And then I want to skip down a bit  
3 because you were explaining some of these other steps, to  
4 the third bubble where it says, "Following verification,  
5 View Point Health Care Coordinator facilitates an initial  
6 Child & Family Team Meeting (CFTM) to develop an Action  
7 Plan."

8 Who are all of the people who are involved in a  
9 CFTM meeting?

10 A So, first and foremost, is the family. One of  
11 the things, again, that kind of drew me to the High  
12 Fidelity Wraparound model is that it's a family choice  
13 model where the family has to be willing to be engaged  
14 with the program, and so the family is the first  
15 participant.

16 The coordinator is the second, pretty standard  
17 participant, and then a representative from our program,  
18 whether that be the social worker or it could have been a  
19 program administrator would be the three standing  
20 members.

21 And then the other members would be based on  
22 current services that this -- this child and family were  
23 receiving, or any suggested resources that were  
24 identified, they would be participants within that  
25 meeting as well.

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1 Q All right. This next bubble then says that the  
2 "View Point Health Care Coordinators will contact the  
3 student and family weekly to coordinate care and support  
4 activities and identify additional resources to meet the  
5 needs of the student and family."

6 Can you explain what that looks like in  
7 practice?

8 A So, essentially, it's reaching out to the  
9 family to do sort of an interview, just gathering  
10 information of what the parent concerns might be, what  
11 the -- the parent views as being the issue for the  
12 student or for the family. And so they would identify  
13 just, you know, through that interview process whatever  
14 the family member or guardian identified as being a need.

15 And so then from there, the coordinators and  
16 the value of those coordinators is they are skilled in  
17 knowing resources that are available locally and sort of  
18 just knowing what's out there. And then based on that  
19 needs assessment, they would reach out to the various  
20 resources and engage them on this team to support the  
21 family.

22 Q And then it sounds like, just looking at this  
23 next step, every 30 days there would be a child and  
24 family team meeting --

25 A Yes.

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1 Q -- to reconvene?

2 Okay. How does the student exit from the  
3 Wraparound program?

4 A Well, as it states on the flowchart, like,  
5 whenever they met the goals within the action plan, the  
6 family requests to be discharged, or, you know, if the  
7 student transfers to another service, that is warranted.

8 Q What are the goals that students would have to  
9 meet in order to exit from the program?

10 A From the Wraparound program?

11 Q Yes.

12 A So it's the items that are listed on that  
13 action plan, and it would be individualized based on the  
14 supports that were determined to be needed at that  
15 interview.

16 Q Are these individualized action plans?

17 A Yes.

18 Q Has this general process looked similar  
19 throughout the programs and since the program's  
20 inception?

21 A Yes.

22 Q Have there been any significant changes that  
23 have occurred?

24 A Well, the one we discussed earlier. Instead of  
25 the individual kind of operating through View Point, we



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1 now have a person that's embedded within our program that  
2 is trained and able to provide this High Fidelity model,  
3 and so now it's -- it's more internal within our program.

4 Q What is that person's name?

5 A Joi Whitaker-Wilson.

6 Q What is her official title?

7 A Community parent liaison.

8 Q And her position is funded through the  
9 State's -- State's GNETS grant?

10 A Yes.

11 Q All right. I want to transition to talk about  
12 the role of the State agencies in supporting programs  
13 like yours and getting initiatives like this off the  
14 ground.

15 What support, if any, did the State DOE provide  
16 when you initially launched the Wraparound program?

17 A Funding -- well, initially, there was not  
18 really any support. It was just kind of an idea, an  
19 initiative that we started. And so we -- we rolled it  
20 out and we implemented it, and we've been carrying and  
21 moving forward with it without even necessarily any  
22 support from --

23 Did you ask about DOE, what --

24 Q Yes.

25 A -- agency?

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1 Q DOE specifically.

2 A Yes.

3 Q At the beginning did the State DOE provide any  
4 funding?

5 A No, because initially again View Point provided  
6 the coordinators.

7 Q Also at the beginning, did DOE have any  
8 examples or models to share on how to implement the  
9 Wraparound program in GNETS?

10 A No.

11 Q What support, if any, did DBHDD provide when  
12 you initially launched the Wraparound program?

13 A I believe that there was a connection between  
14 View Point and DBHDD in terms of provisioning the  
15 coordinators, and I'm not really sure of the details of  
16 their involvement with View Point. But directly to the  
17 program there was not any support directly from DBHDD.

18 Q And when you started the program, were you able  
19 to obtain any examples or models of how to implement a  
20 Wraparound program from DBHDD?

21 A Not from DBHDD. All of the models, examples,  
22 training, support, all of that came from Georgia State  
23 University.

24 MS. HAMILTON: I'm handing the court reporter  
25 what I'd like to have marked as Plaintiff's Exhibit 452.

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1 (Plaintiff's Exhibit 452 was marked for  
2 identification.)

3 Q BY MS. HAMILTON: This document has an initial  
4 first page that is Bates-stamped GA00040636. This is a  
5 February 15th, 2016 e-mail that Derrick Gilchrist sent to  
6 Nakeba Rahming with the subject "Partnership with DBHDD."

7 I'll give you a moment to look at it. Let me  
8 know when you're ready.

9 A I'm ready.

10 Q Okay. Do you recognize this e-mail?

11 A Yes, I do.

12 Q What was this e-mail about?

13 A Just wanting to share ideas that I have about  
14 partnering with other agencies to just enhance services  
15 and create something that may have been a little bit more  
16 effective and efficient in supporting.

17 And I think this e-mail was specifically after  
18 I had attended the -- the conference, and the dates, you  
19 know, it's been a few years ago, so I don't exactly  
20 remember kind of the timeline of how that occurred, but I  
21 believe this was after I attended the conference and, you  
22 know, I -- I became interested in implementing the  
23 Wraparound program, and I saw value in kind of, you know,  
24 what -- what the potential could be with a collaboration  
25 like this.

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1 Q And I just want to read this first part here.  
2 You say, "Good morning, Nakeba. You mentioned last week  
3 an upcoming meeting with DBHDD and your interest in  
4 hearing ideas or receiving information about how a  
5 potential partnership with this other State agency might  
6 look."

7 When you say that she mentioned last week that  
8 there was going to be an upcoming meeting with DBHDD,  
9 where -- what was the context for where you would have  
10 heard that?

11 A No idea.

12 MS. JACKSON: Object to form.

13 THE WITNESS: No idea. I don't know if that  
14 was in a meeting. And again, keep in mind the timeline.  
15 I think this was around the time we were developing a  
16 strategic plan. So I don't know if -- if it occurred in  
17 the context or scope of one of those meetings, but, you  
18 know, the thing about Nakeba was, I do know she was from  
19 Florida, and so she was interested in helping to refine  
20 and improve the model. And so, you know, I know she had  
21 stated she was just interested in -- in hearing ideas.

22 Q BY MS. HAMILTON: What was your understanding  
23 of the partnership that Ms. Rahming was trying to develop  
24 with DBHDD?

25 A At one point in time she had us attend a

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1 meeting that I think was -- it was about Apex and SAMHSA.  
2 And when I say "us," it wasn't all of the GNET directors.  
3 There were a few select directors. I was one of the  
4 ones, and it may have just been individuals who were on  
5 the committee to develop the strategic plan but we  
6 attended a meeting in regards to Apex and SAMHSA funding.

7 (Court reporter clarification.)

8 Q BY MS. HAMILTON: And you were saying that you  
9 sent this e-mail -- the time when you sent this e-mail  
10 would have been around the time that you were also  
11 developing the South Metro GNETS Wraparound program?

12 A It could have been, but I don't -- it's hard  
13 for me to remember exactly how all of that unfolded.

14 Q Did you have any opportunities to meet with  
15 Ms. Rahming to share your ideas?

16 A And I -- I don't remember if we met. I believe  
17 we did have a phone call conversation that I shared with  
18 her my experience at the conference and some ideas of how  
19 we could become more clinical and therapeutic as a  
20 network. And I don't -- but I don't remember, you know,  
21 kind of where the conversation went from there.

22 Q And why would a partnership between the State  
23 DOE and DBHDD have been beneficial to the GNETS program?

24 A You know, I think the initial purpose and  
25 charge of GNETS was to be therapeutic and clinical in

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1 nature in supporting children when it was initially  
2 founded in the '70s. And, obviously, DBHDD is the agency  
3 that oversees mental health services within the State.  
4 And so it just seemed logical to me that a program that  
5 was designed or intended to be really therapeutic and --  
6 and clinical should have some collaboration or connection  
7 with or partnership with the agency that is -- that was  
8 designed and created to oversee mental health.

9 MS. HAMILTON: I am handing the court reporter  
10 a document that I'd like to have marked as Plaintiff's  
11 Exhibit 453.

12 (Plaintiff's Exhibit 453 was marked for  
13 identification.)

14 Q BY MS. HAMILTON: The first page of this  
15 document has a Bates stamp of GA00062394.

16 The top part of this e-mail is a July 2016  
17 e-mail exchange between Nakeba Rahming and the GNETS  
18 directors, and then their -- it looks like there is a  
19 number of different correspondences that got replied to  
20 in this chain, including some one-on-one responses  
21 between Derrick Gilchrist and Cassandra Holifield and  
22 Nakeba Rahming and Danté McKay.

23 If you want to take a moment to look at it, let  
24 me know when you're ready.

25 A Okay.

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1 Q Do you recognize this document?

2 A I don't. I see it, but I don't remember this  
3 exchange.

4 Q Okay. Do you remember Ms. Rahming -- do you  
5 remember offering to host a visit from Ms. Rahming and  
6 Mr. McKay?

7 A I don't remember it. I see it here, but then I  
8 also see the time that I sent that e-mail was at  
9 1:13 a.m. And so, you know, it just -- it's not coming  
10 to mind, but it's not surprising. If the opportunity  
11 to -- to host a site visit, because at that point -- this  
12 is July of 2016. By that point, you know, I was all on  
13 board with the collaboration and, you know, really wanted  
14 to make that happen. And this may have been a result of  
15 the previous e-mail where I talked to Nakeba.

16 Q All right. And so the latter part of this  
17 e-mail was focused on -- well, can you confirm that based  
18 on what this e-mail is saying, the latter part of this  
19 e-mail was focused on scheduling site visits for  
20 Mr. Rahming and possibly Mr. McKay to visit some of the  
21 GNETS programs?

22 MS. JACKSON: Object to form.

23 THE WITNESS: Yes.

24 MS. HAMILTON: Okay. I'd like for the court  
25 reporter to mark this next document as Plaintiff's

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1 Exhibit 454.

2 (Plaintiff's Exhibit 454 was marked for  
3 identification.)

4 Q BY MS. HAMILTON: All right. So Plaintiff's  
5 Exhibit 454 has a Bates stamp on the first page of  
6 GA00042459. This is a November 6th -- November 16th,  
7 2016 e-mail chain between Derrick Gilchrist and Nakeba  
8 Rahming. I'll give you a moment to take a look, and let  
9 me know when you're ready.

10 A I'm ready.

11 Q Do you recognize this e-mail?

12 A Yes.

13 Q I want to focus on the November 16th, 2016  
14 e-mail that you sent to Mr. Rahming. And you mention  
15 that the two of you had, quote, discussed Ms. Rahming  
16 attending one of our Wraparound collaborative clinical  
17 meetings with our mental health providers and partners.

18 What are the -- what -- what meetings are being  
19 referenced here?

20 A I -- I believe this -- we were at the point  
21 of -- of receiving the support from Georgia State  
22 University, and so we were having a series of meetings  
23 and preparing for our implementation of the High Fidelity  
24 Wraparound model. And so I believe I extended an  
25 invitation for her to attend so that she could kind of



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1 see our progress and how it was developing for us to be  
2 able to kind of implement this within our program.

3 Q Okay. So the State DOE had expressed interest  
4 in learning more about the Wraparound model that you were  
5 implementing?

6 A Through Ms. Rahming, yes.

7 Q Through Ms. Rahming, okay.

8 Who was providing the training that's being  
9 referenced here?

10 A Astrid Prudent, they had another -- the Georgia  
11 State University Center of Excellence, they had another  
12 trainer. I -- I do not remember her name, but I do  
13 remember Astrid Prudent was sort of our liaison between  
14 our program and also Georgia State University.

15 Q And then further down you also mention -- you  
16 say, "I will send you and Danté the dates of our clinical  
17 meetings occurring late January through early March so  
18 you can attend when convenient for your schedules."

19 Did you -- is this -- is this Danté referenced  
20 here Danté McKay?

21 A Yes.

22 Q Did you also extend an invitation then to  
23 Mr. McKay to attend the clinical meetings as well?

24 A I can't say that I remember extending that  
25 invite, but if I said that that was what I was going to

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1 do in this e-mail, I'm pretty sure I followed up with it.

2 Q And what did you hope would come from having  
3 Ms. Rahming and Mr. McKay attend these clinical meetings?

4 A Conversation and discussion about possibilities  
5 and the potential of again this whole -- more wholistic  
6 view, this more intensive therapeutic model that -- you  
7 know, that they would kind of see and maybe perhaps gain  
8 a better understanding of how this could be -- could be  
9 beneficial for all stakeholders.

10 Q How would you describe the effectiveness of the  
11 South Metro Wraparound program in the first three years  
12 of implementation?

13 A It was a struggle. But I think, you know, I  
14 anticipated that. With it being a family choice program,  
15 families were not necessarily as receptive to the idea.  
16 There were some logistical challenges that we had to work  
17 through with View Point because they were coming from a  
18 perspective of, sort of doing this through the lens of a  
19 mental health provider, and not necessarily doing it in  
20 collaboration with another agency or -- or entity. And  
21 so there were logistics that we just had to work through.

22 For example, I mentioned earlier when you asked  
23 about the process of how families are enrolled or  
24 referred to the Wraparound, their model was that their  
25 coordinator had to reach out to families, explain it and

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1 ask if they would -- if they would consent.

2 Well, our families when they would receive this  
3 phone call from an agency or an entity that they weren't  
4 familiar with, they did not have a relationship with,  
5 they would instantly not be interested because it was  
6 coming from a -- a person that they didn't know.

7 And so we worked to, on that front-end process,  
8 make that phone call as a collaboration between our  
9 social worker, someone who they knew, were familiar with,  
10 had a certain comfort level, could explain and ask  
11 questions -- or answer questions in collaboration with  
12 the View Point coordinator. And we found more success  
13 when it was more a collaborative call versus just the  
14 View Point coordinators calling and reaching out to  
15 families.

16 And so there were just several little detail  
17 logistical things like that that we had to work through  
18 in terms of just creating a system that would kind of be  
19 effective to getting support from the families, because,  
20 again, it goes back to a family choice.

21 And -- and you want the families to be engaged.  
22 You want them to take advantage of the service,  
23 understand how the service could help them, but it was  
24 hard to communicate that initially, just because they  
25 were receiving calls from people that they didn't know,

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1 and they were just not receptive to that.

2 But I think once we worked out some of the --  
3 some of the logistics, it -- I felt like it flowed  
4 better. It -- it -- it worked better closer toward the  
5 end of the three-year period you asked about.

6 MS. HAMILTON: Okay. I am handing the court  
7 reporter what I would like to have marked as Plaintiff's  
8 Exhibit 455.

9 (Plaintiff's Exhibit 455 was marked for  
10 identification.)

11 Q BY MS. HAMILTON: And I should note that this  
12 document includes a cover e-mail and two attachments.  
13 The initial page has a Bates stamp of GA03945133.

14 And this first page is a cover e-mail dated  
15 July 31st, 2020, between Derrick Gilchrist and Susan  
16 McLaren. I'm sorry. It's from Dimple Desai.  
17 D-i-m-p-l-e, D-e-s-a-i, and it was sent to Derrick  
18 Gilchrist with several other people copied.

19 I will give you a moment to take a look at it.  
20 Let me know when you're ready.

21 A Okay.

22 Q Do you recognize these documents?

23 A Yes.

24 Q What are they?

25 A So this was a report that was provided by the

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1 Center of Excellence summarizing our implementation of  
2 our Wraparound program for a three-year period.

3 Q And the cover e-mail comes from a woman named  
4 Dimple Desai, last name is D-e-s-a-i. Who is Ms. Desai?

5 A She was -- she was a worker. I'm not sure what  
6 her title, but she was with the Center of Excellence.

7 Q And you mentioned earlier that among other  
8 roles that the Center of Excellence engaged in monitoring  
9 was the -- let me take a step back.

10 The Center of Excellence engaged in monitoring,  
11 correct?

12 A Yes.

13 Q Was the creation of this final report part of  
14 their monitoring responsibilities?

15 A Yes.

16 Q Did anyone else work on this report with  
17 Ms. Desai?

18 A She -- Ms. Desai was actually -- she came in on  
19 the tail end, so she was actually not in place the entire  
20 time. A young lady by the name of -- and I don't  
21 remember her last name. It was Ashley was actually the  
22 person who supported us during the majority of the  
23 project. And so I think Dimple came aboard maybe during  
24 the final months of the project, and so there wasn't as  
25 much support received from her as it was from Ashley.

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1 And their role, Ashley's role was mainly -- so  
2 the data dashboard that you see in the back is -- is what  
3 Ashley was sort of in charge of, collecting that data.  
4 And I don't remember if she actually designed the  
5 dashboard, but that was sort of her role in these -- in  
6 this whole initiative.

7 Q Okay. And just to be clear for the record,  
8 that document you're referencing is the last attachment,  
9 and it's the Wraparound Fidelity -- it's the Wraparound  
10 Fidelity Index - Short Form WFI-EZ Dashboard?

11 A Yes.

12 Q All right. So let's turn to the report. And  
13 just to confirm, this is the final report, correct?

14 A Yes, this appears to be the final report.

15 Q And it covers a time frame of July 1st, 2017  
16 through June 2020?

17 A Yes.

18 Q I want to walk through this report together.

19 A Okay.

20 Q If you can turn to page 4 of the report.

21 A Okay.

22 Q The introduction discusses what COE or the  
23 Center of Excellence was hired to do. Can you summarize  
24 what -- what their responsibilities were?

25 A So, primarily, again, providing training,

1 professional development in terms of informing and  
2 training our staff on what the Wraparound model was  
3 because there was a portion of time invested in building  
4 buy-in from our staff because social workers played an  
5 integral role in communicating this program to families,  
6 and so we wanted to make sure everyone had a firm  
7 understanding of the program and how it could benefit  
8 families.

9 And so we went through a period of professional  
10 learning and developing so that our social workers and  
11 staff would -- would have an understanding and be bought  
12 into the system.

13 And then after the professional development and  
14 learning period, they sort of supported us through the --  
15 the referral steps of how -- what that should look like  
16 and what it needed to look like. They also kind of  
17 helped explain the child and family team meeting process,  
18 what that looked like.

19 And so they essentially were charged with just  
20 gathering -- at that point gathering information and data  
21 on just how our implementation was going, the students we  
22 were serving, and just collecting demographic data and  
23 information.

24 Q And it says here that the pilot included five  
25 of your South Metro GNETS schools; is that correct?

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1 A Five of our sites, yes. And at that time we  
2 were still in Fulton County, and so Fulton County was a  
3 part of -- select sites in Fulton County was part of the  
4 program initiative.

5 Q Okay. Also, I meant to ask you this question  
6 earlier. When did Henry County become part of the South  
7 Metro GNETS program?

8 A I believe it was -- it was during the 2017/2018  
9 school year.

10 Q Okay.

11 A Yeah.

12 Q Okay. So that would have been in time for them  
13 to participate in this program?

14 A Yes.

15 Q All right. I want to move to the population  
16 description section of the report. How many total  
17 referrals were made during the three-year time frame of  
18 the evaluation?

19 A It says 100 referrals were made.

20 Q And just to make sure I'm understanding, where  
21 it says 100 referrals, those were 100 referrals for 83  
22 unique or individual youth?

23 A Yes.

24 Q So not 100 students being referred?

25 A 83 students, and there may -- there may have



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1 been duplications. So, like, we would refer. One family  
2 declined. A period of time passes, we kind of revisit  
3 with the family, you know, to share more information.

4 Also, I know referrals were made initially with  
5 the -- with sort of the first process that I described  
6 with the View Point. Coordinator was making calls by  
7 themselves, and so with families that declined during  
8 that approach, once we figured out, hey, let's do  
9 collaborative calls, they may have done another referral  
10 and then called again in conjunction with our social  
11 worker.

12 Q Okay. This next line here says, "Forty-four  
13 percent of all referrals to the South Metro GNETS did not  
14 result in Wraparound participation."

15 And what you were just saying, I'm wondering if  
16 that connects here, but what were the reasons that you  
17 would have had 44 percent of your referrals not result in  
18 participation?

19 A It could have been, you know, the initial part  
20 of not being familiar with View Point, not knowing who  
21 was contacting them.

22 Also, you know, sometimes families are  
23 resistant or hesitant to have agencies in their home  
24 because, you know, when they receive the description of  
25 the plan, there is a time commitment. They have to meet

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1 once -- once a month. There is also just a commitment of  
2 energy in -- of engagement that sometimes parents, you  
3 know, may not be willing to take on.

4 Q Okay. So then moving to this next paragraph,  
5 let me know if I'm reading this correctly. It says, "A  
6 total of 46 unique youth were enrolled (currently active  
7 or discharged) in Wraparound services during the  
8 reporting period."

9 Is it correct to say, then, that of the 83 who  
10 you started with, 46 of those students actually enrolled  
11 in -- in your Wraparound program?

12 A Yes.

13 Q Okay. All right. I want to move on to the  
14 next page under "Key Outcomes." And it looks here  
15 underneath Programmatic Outcomes it says -- going back to  
16 those 46 who were enrolled, of those 46 there were 35  
17 youth who completed the Wraparound program; is that  
18 correct?

19 A Yes.

20 Q And also it looks like it also is saying here  
21 that that does not include students who were still going  
22 through the process, but those are the ones who actually  
23 completed?

24 A Yes.

25 Q Okay. All right. So can you explain to me

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1 what this first bullet point means. It says, "One-third  
2 of those 35 students were discharged due to successfully  
3 graduating or successfully opting out of the program."

4 A So the -- the graduating piece is that they met  
5 the goals and objectives that were outlined in the action  
6 plan. And the opt out, I -- I would imagine meant that  
7 they were able to follow the process for opting out  
8 appropriately versus just stop responding to attempts to  
9 either meet or to communicate with the coordinator.

10 Q What would have happened to the other  
11 two-thirds of the students who did not successfully  
12 graduate or successfully opt out?

13 A I think in those cases, a lot of those were  
14 families that the coordinator either lost contact with  
15 due to perhaps family relocating, family decided they  
16 didn't necessarily want or have the time to be engaged in  
17 the monthly meetings. But for whatever reason, they  
18 either stopped responding or they just did not continue  
19 their engagement, participation in the Wraparound  
20 program.

21 Q Did you have any contact or communication with  
22 families who -- let me rephrase that.

23 Did you have any direct contact or  
24 communication with families regarding their decision to  
25 not complete the Wraparound program?

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1 A I did not directly.

2 Q Who would have been the person or persons  
3 responsible for maintaining that communication?

4 A Our social workers and the coordinator.

5 Q All right. Now I want to move to the Academic  
6 Outcomes section on page 6. And the report says that the  
7 data sources here were not readily available to be  
8 analyzed. Why wasn't the Center of Excellence able to  
9 report on the academic outcomes for the students in the  
10 program?

11 A The end of this project, if you look at the  
12 dates, coincided with the initial COVID pandemic during  
13 that spring of 2020, and so there were limitations there  
14 in regards to things not being readily available or  
15 accessible during that initial period of COVID-19, would  
16 be what I would say would be the primary reason.

17 But I think the care coordinators, because it  
18 also says here the care coordinators did not also always  
19 have access, and that was, again, one of those logistical  
20 challenges with the care coordinators, because they were  
21 coming from an environment where they were used to kind  
22 of operating and working in the mental health field and  
23 arena. And so having access to educational information  
24 and data wasn't something that they were used to.

25 And in addition to that, there was a disconnect

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1 sometimes between those care coordinators and the  
2 program.

3 Q And it looks like the rest of page 6 and page 7  
4 continues to talk more about I think these are the  
5 child-functioning outcomes. How familiar are you with  
6 these additional assessments that were performed?

7 A We -- one of our -- one of the steps that I  
8 sort of took once we kind of became really familiar with  
9 the whole process, the assessment tools and everything  
10 that was being utilized, the CANS, for example, was not  
11 something that I was necessarily familiar with, but then  
12 I will refer back to my experience as a behavioral health  
13 assessor with S and T and FIS that we talked about from  
14 my resume.

15 And so I had administered what the State used  
16 to use as a tool, which was the CAFS, and the CANS is the  
17 equivalent. And so I -- I had an understanding of what  
18 the CANS was and why it was useful. And so we had our  
19 social workers trained in being able to administer the  
20 CANS.

21 And so I had a, you know, understanding and a  
22 knowledge of that particular tool, but any of the other  
23 skills or tools that are in here I was not familiar with.

24 Q Okay. So we'll just talk a minute about the  
25 CANS briefly. Is it correct that CANS stands for Child

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1 Adolescent -- Child Adolescence Needs and Strengths  
2 assessment?

3 A Yes.

4 Q Okay. And it looks like there's a -- one  
5 section that's highlighted here. It says, "Of the five  
6 youth reporting baseline and discharge CANS assessments,  
7 four showed improvement."

8 Do you -- do you know why there were only five  
9 students who were able to report the data for this one?

10 A I -- I don't know why there were only five  
11 students. I don't.

12 Q Okay. But of those five, it says that four  
13 showed improvement?

14 A Yes.

15 Q And then we won't -- since I know you said you  
16 weren't as familiar with the other scales, we won't get  
17 into those.

18 But I am curious for the CANS, when it says a  
19 student is showing improvement, what is that measuring?

20 A The level of need for support. And so an  
21 improvement on that skill would show a decreased need for  
22 levels of support. So they're able to function more  
23 independently. They're able to perform at a level that  
24 is expected, you know, based on age, grade, and those  
25 type of things.

1 Q Okay. And then on page 7 there is a brief  
2 discussion about the WFI-EZ that you referenced earlier.  
3 How much time did you spend reviewing that document when  
4 this evaluation was released?

5 A Evaluating the Fidelity index?

6 Q Yes.

7 A I didn't really evaluate the actual instrument  
8 or tool itself. I did review the data as a result of the  
9 families that were surveyed.

10 Q Okay. And so here in this first paragraph, at  
11 the end of it, it says, "Due to programatic challenges,  
12 WFI-EZ administration did not begin until the last year  
13 of the study period (2019 to 2020) and is limited to a  
14 small subset of youth served throughout the program."

15 Do you know what programatic challenges the  
16 Center of Excellence is referring to here?

17 A So there were challenges with staffing the care  
18 coordinators, finding the right fit.

19 In terms of the appropriate staff or personnel,  
20 again, with this being a project between -- and I'll say  
21 three separate agencies because it -- or entities between  
22 the Center of Excellence, View Point Health, and also  
23 South Metro, there was just at times communication gaps.  
24 And, you know, as I stated earlier, just the initial  
25 first few years was just rough in terms of sort of

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1 addressing all of the issues.

2 Q All right. I want to turn to page 8 which is  
3 the conclusion. And in this first paragraph, would you  
4 say it's accurate that the report is acknowledging that  
5 the model may increase access to services for youth with  
6 SED and their families but also highlights a number of  
7 implementation challenges?

8 MS. JACKSON: Object to form.

9 THE WITNESS: Yes.

10 Q BY MS. HAMILTON: And what does SED stand for?

11 A That was an acronym that they -- that Center of  
12 Excellence used, and so I -- I do not remember what SED  
13 referred to.

14 Q Do you recall if it may have been severe  
15 emotional disabilities?

16 A That could be potentially it. It sounds right,  
17 but I --

18 Q But you don't remember?

19 A I can't remember, yeah.

20 Q And I guess just to clarify my last question,  
21 in this first paragraph, are there things that are  
22 high- -- are there aspects of the Wraparound program that  
23 are highlighted as being positive results of the program?

24 A Yes. I -- I think it was stated in the data  
25 from the survey that I think 100 percent of the families



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1 reported -- 100 percent of the families that were  
2 surveyed reported satisfaction with the program.

3 I think also in pointing out the data in  
4 regards to while there were only five students  
5 administered the CANS for demonstrated growth and the  
6 reduction of needs for additional support.

7 And so those are, you know, two of the things  
8 that spoke to me at the end of the period that kind of  
9 indicated that, you know, this is a -- a program that  
10 really could benefit children and their families.

11 Q Okay. And then the last sentence of that first  
12 paragraph says, "Although the data indicates some  
13 positive outcomes, the data also supports areas for  
14 improvement, as noted above."

15 In our discussion you've been highlighting some  
16 of these challenges. One that's noted here, it says, one  
17 challenge is that program variables for both South Metro  
18 GNETS and View Point Health care impacted the development  
19 of an effective process. And then it goes on to list  
20 some examples. I believe this is what you may have been  
21 referring to earlier.

22 But the first example here says that -- it  
23 talks about collaboration issues.

24 A Uh-huh.

25 Q Is there anything else that you would add

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1 beyond what you've already shared in terms of there being  
2 collaboration issues?

3 MS. JACKSON: Object to form.

4 Q BY MS. HAMILTON: And just I can restate that.

5 You've already given some examples of  
6 collaboration issues that existed between South Metro  
7 GNETS and View Point Health Care. Is there anything else  
8 you would add to that?

9 A Staffing -- you know, I think I touched on the  
10 importance of -- of staff being able to do this work,  
11 having started as a paraprofessional and been a teacher,  
12 also been a paraprofessional in the mental health world,  
13 it takes certain types of individuals to be able to do  
14 this work effectively.

15 And I think at times there were some -- some  
16 staffing concerns, and that is primarily one of the  
17 reasons that led me to the conclusion that we needed to  
18 embed this internally within our program. And so that's  
19 why we moved to hiring our community a parent liaison.

20 And so I think, you know, the collaboration  
21 piece, but then also staffing, you know, was -- was  
22 definitely one of those issues on the front end.

23 And then this also being kind of a  
24 collaboration of a project of that was -- and they used  
25 the term "innovative" in this report, but it was just

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1 totally new and foreign to everyone, including myself.  
2 And so it was hard at times to secure buy-in from people  
3 on both sides in terms of sort of the mission and the  
4 vision. And so I -- I -- I know that those were  
5 primarily the main sort of barriers for us having greater  
6 success with it.

7 Q Okay. And here it's like midway through the  
8 second paragraph, it says, "Other variables that impacted  
9 implementation included staff turnover."

10 Is this what you were referring to earlier when  
11 you said staffing?

12 A Well, the turnover piece was also one, but also  
13 having the right people with the appropriate mindset and  
14 also the appropriate understanding of -- of the project  
15 was really what I was referring to.

16 Q Also another challenge listed here it says,  
17 "Due to the transient nature of the student population."

18 What -- what does that mean?

19 A So, you know, we -- of the families that we  
20 were able to successfully get onboard, get enrolled in a  
21 program, you know, we -- we make progress, you know, we  
22 would be working with them, and then something would  
23 happen, and they would have to move to another school  
24 system. They would have to move to another state.

25 And so that kind of impacted just our total

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1 outcomes, just, you know, our students just moving  
2 around, you know, not being in -- in one place for  
3 extended periods of time to receive consistent services.

4 Q And a moment ago when you were talking about  
5 staffing, you were saying that you -- it wasn't just  
6 staff turnover, but also sort of the mindset of the  
7 people who were doing the work?

8 A Uh-huh.

9 Q What kinds of -- what kind of individual would  
10 it take to be able to do this work effectively?

11 A Individuals who understand the importance of a  
12 wholistic view and individuals who understand the needs  
13 of family and children. Individuals who have a  
14 understanding of mental health illness. Individuals who  
15 have a -- a temperament and disposition that allows them  
16 to work with families who may be challenging in terms of  
17 not being bought in, not being fully committed, and  
18 pushing through those challenges and not necessarily  
19 giving up or just giving up on a family or giving up on a  
20 child because there may be some resistance.

21 And so you just have to have a -- really a  
22 therapeutic disposition in order to really do this type  
23 of work.

24 Q Okay. Were any steps taken after this report  
25 was issued to address the programmatic issues -- problems

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1 that were just discussed?

2 A Yes, we added the coordinator to -- to our  
3 program.

4 Q Any other steps?

5 A Well, and since we've had Ms. Whitaker-Wilson  
6 on staff, we've sort of refined some of the processes.  
7 It gives us, with her being a staff member, greater  
8 autonomy to facilitate various activities.

9 For example, we do parent workshops. We  
10 facilitate open house events. We facilitate different  
11 things to bring families in. And so when they come in,  
12 they're not just hearing about just one program or  
13 service that we have available. They're hearing the  
14 whole thing. And it's sort of presented as a package  
15 versus pieces with this other agency, and then we have  
16 this service with this agency, and then we're doing this  
17 internally.

18 So it's really more of a comprehensive package  
19 that we're able to offer parents as part of our program.  
20 And that is, I think received better from families  
21 because it doesn't seem like as many agencies or people  
22 who will be involved in -- in their house or in their  
23 home. It's just coming from one program.

24 Q The report also notes in this third paragraph  
25 that the implementation of pilots in complex environments

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1 can be challenging.

2 Why do you think they're referring to your  
3 pilot -- why do you think they're saying here that the  
4 implementation of pilots in complex environments can be  
5 challenging?

6 MS. JACKSON: Object to form.

7 THE WITNESS: Well, I -- I think that is  
8 alluding to what we talked about a second ago with the  
9 transient nature of the types of families that we serve.  
10 Because this was a -- a family choice program that is 100  
11 percent dependent upon the family agreeing and wanting  
12 the service, just securing buy-in.

13 So I think just with the unique set of -- of  
14 factors that face the families who are served in GNETS  
15 program, that there are just some built-in challenges  
16 with being able to kind of effectively roll it out.

17 Q BY MS. HAMILTON: And then this last paragraph  
18 discusses the need to incorporate other forms of data in  
19 the analysis. And, if you look at this, it included a  
20 number of other types of ways to track data.

21 Why -- why is it important that other forms of  
22 data be tracked?

23 MS. JACKSON: Object to form.

24 Q BY MS. HAMILTON: This is on page 8. So in the  
25 conclusion, the last two paragraphs.

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1 A Uh-huh.

2 Q In fact, if you look at the last sentence of  
3 the third paragraph, it says, "As the pilot program  
4 continues, it will be important to further develop data  
5 sharing protocols across schools and districts that allow  
6 access to education data for youth receiving."

7 Why is it important that there continue to be  
8 the development of data sharing protocols?

9 MS. JACKSON: Object to form.

10 THE WITNESS: So I -- I think that was what I  
11 was referring to or alluding to earlier, was just being  
12 able to serve a child wholistically, and then having  
13 access to data across agencies and entities is important  
14 to present a -- sort of, a composite or comprehensive  
15 view of -- of a child, student or family so that when you  
16 are planning/developing IEPs or treatment plans, child  
17 and family team plans, you're able to include the whole  
18 picture and not just individual pieces of the child,  
19 student or family.

20 Q BY MS. HAMILTON: Did anyone from the Center of  
21 Excellence follow up with you after the report was issued  
22 to help improve the Wraparound program?

23 A There has not been any follow-up from the  
24 Center of Excellence.

25 Q Okay. And their contract has ended, correct?

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1 A Correct.

2 Q Did anyone from the State DOE review this  
3 report.

4 MS. JACKSON: Object to form.

5 Q BY MS. HAMILTON: To your knowledge?

6 A Not to my knowledge, I don't know. It was  
7 not -- I did not necessarily provide it to the DOE. I --  
8 I don't remember doing that, but I don't know if they had  
9 access through their connection with DBHDD or the Center  
10 of Excellence.

11 Q Okay. Do you know if the report was provided  
12 to anyone from DBHDD?

13 A The report was provided to View Point Health,  
14 so they had access to it, and so they are an extension, I  
15 guess, of DBHDD. So...

16 Q Are there any resources that the State DOE  
17 could have provided to address any of the challenges that  
18 we've discussed as a result of the -- as a result of the  
19 findings from this report?

20 MS. JACKSON: Object to form.

21 And can we take a break also?

22 MS. HAMILTON: Yeah, if I can just wrap up  
23 this. Just two or three more questions.

24 MS. JACKSON: Okay.

25 THE WITNESS: Could you kind of restate that,



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1 because I didn't understand?

2 Q BY MS. HAMILTON: Sure.

3 Are there any resources that the State DOE  
4 could have provided to address the challenges that we've  
5 walked through in this report?

6 MS. JACKSON: And I just want to renew my  
7 object to form.

8 THE WITNESS: No, I don't believe so. All of  
9 the challenges that we face were really organic in kind  
10 of a pilot process. So I actually think it was healthy  
11 and good that we did experience those challenges as a  
12 learning experience, as an opportunity to learn that a  
13 project initiative like this can be effective, can be  
14 successful, but there are certain logistical challenges  
15 that have to be addressed. There are certain details  
16 that have to be ironed out in order for it to be  
17 successful.

18 And so with that, I don't -- I don't believe  
19 there is anything that DOE or any other entity or agency  
20 could have done at that stage.

21 Q BY MS. HAMILTON: Moving forward, are there any  
22 resources that the State DOE could provide to help you  
23 address these challenges if they arise moving forward?

24 MS. JACKSON: Object to form.

25 THE WITNESS: Well, always funding is important

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1 to secure. Also, our -- our numbers were, you know, kind  
2 of based on the number of coordinators we have. And so,  
3 you know, I think funding and just the platform to be  
4 able to collaborate and work together.

5 Q BY MS. HAMILTON: Would the same be true for  
6 DBHDD?

7 MS. JACKSON: Object to form.

8 Q BY MS. HAMILTON: So would funding and just  
9 having the platform to collaborate and work together also  
10 be beneficial in --

11 A I --

12 Q -- connection --

13 A I --

14 Q -- with DBHDD?

15 A -- think more so the -- the platform to be able  
16 to collaborate being at the table to work through, iron  
17 out the logistical challenges, and just really being a  
18 collaborative partner with -- with the program would --  
19 would be helpful.

20 Q Okay. How many students are currently  
21 participating in the Wraparound program?

22 A I do not know that right off the top of my  
23 head.

24 Q Do you have a rough estimate of how many?

25 MS. JACKSON: Object to form.

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1 THE WITNESS: I -- I don't want to guess.

2 Q BY MS. HAMILTON: Has the program increased in  
3 size since you did the Wraparound pilot?

4 A It has not, because we only have one community  
5 parent liaison, so she has a maximum caseload. You know,  
6 between 15 and 20 students is what one individual can  
7 manage. And so I guess if I had to guess, you know, the  
8 maximum of what we could really support now would be 20  
9 students with our one community parent liaison.

10 Q Okay. And I just --

11 A At the time of that pilot, I want to say we had  
12 four.

13 Q Okay. I just have two more questions.

14 What are you doing now to measure the progress  
15 and outcomes of the students participating in your  
16 Wraparound program?

17 A Well, our plan -- and this is -- actually,  
18 Ms. Joi Whitaker came on board in January so we didn't  
19 have a complete year last year. So our plan this year is  
20 to administer the survey again to gauge effectiveness,  
21 family satisfaction, look at the data in terms of for the  
22 action plans that are created, success rates within those  
23 plans. And so that's something -- an activity that we  
24 plan to do at the end of this school year.

25 Q Are there any other GNETS programs that you

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1 know of that are participating in Wraparound projects in  
2 partnership with community service boards?

3 A I introduced Lisa Futch and her GNET program to  
4 View Point, and it's my understanding that they are now  
5 working with View Point in the same way that we did when  
6 we initiated our program.

7 Q What GNETS program does Ms. Futch work with?

8 A She's in Savannah, and there are two Savannah  
9 programs, and I think she's in Coastal Comprehensive.  
10 I'm not -- I can't remember exactly which program, but  
11 she's in Savannah.

12 Q One of the Savannah GNETS programs?

13 A Yes.

14 Q Thank you.

15 MS. HAMILTON: We can go off the record and  
16 take a break.

17 THE VIDEOGRAPHER: Going off the record at  
18 2:53.

19 (The deposition was at recess from 2:53 p.m. to  
20 3:10 p.m.)

21 THE VIDEOGRAPHER: We are back on the record at  
22 3:10.

23 Q BY MS. HAMILTON: And I have a quick follow-up  
24 question from our last discussion.

25 You had mentioned that Ms. Whitaker-Wilson is

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1 on your staff now. Was she -- did she previously work  
2 for View Point Health?

3 A Yes.

4 Q Okay. So you-all are funding someone who  
5 previously worked for View Point Health using the State  
6 GNETS grant funding?

7 A That's correct.

8 Q Okay. All right. I'd like to talk now about  
9 some of the other therapeutic support and services that  
10 you provide students in the South Metro GNETS program.

11 You mentioned earlier that you are familiar  
12 with MTSS; is that correct?

13 A No, I didn't say that I was familiar with it.

14 Q Okay.

15 A We provide support in that process with our  
16 GNET therapists. And so somewhere as a -- as a -- in one  
17 of the tiers of the MTSS inter- -- intervention pyramid,  
18 our therapists are identified as a support or service.

19 So when the LEA has identified that they have a  
20 student that's in that process, needs support, our  
21 therapists are able to provide mental health services.

22 MS. HAMILTON: All right. I'm handing the  
23 court reporter what I'd like to have marked as  
24 Plaintiff's Exhibit 456.

25 (Plaintiff's Exhibit 456 was marked for

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1 identification.)

2 Q BY MS. HAMILTON: All right. You've just been  
3 handed Plaintiff's Exhibit 456. This is a document  
4 titled "South Metro GNETS Therapeutic Service and  
5 Intervention Tiers." The United States received this  
6 document from the South Metro GNETS program in response  
7 to the United States subpoena for documents.

8 Do you recognize this document?

9 A Yes.

10 Q Okay. And does this document cover the 2021 to  
11 '22 school year?

12 A Yes.

13 Q What is this document?

14 A So it's an outline of the services and supports  
15 that are available to students based on the tiers.

16 Q Are these the tiers that you were referring to  
17 earlier during the deposition?

18 A Yes, as it relates to the South Metro tiers.

19 Q Okay. And this is not -- just to make sure I  
20 understand the terminology, you don't consider this part  
21 of MTSS?

22 A No. This is not -- this is not part of our LEA  
23 MTSS intervention pyramid.

24 Q Okay. How did you-all create this document in  
25 the South Metro program? And, actually, let me take a

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1 step back.

2 Did the South Metro program create this  
3 document?

4 A Well, the format of it we did not. You know,  
5 the tier format, we didn't create that. What we created  
6 were the services that are -- that are embedded within  
7 the tiers.

8 Q Okay.

9 A And so we placed the services, supports and  
10 resources that we have based on this tier format or this  
11 tiered approach to supporting students.

12 So we didn't create the tiered approach. What  
13 we did is we created the services, the supports, and  
14 secured the resources to insert within the tiers.

15 Q Is this modeled on a template that you've  
16 received from anyone?

17 A The template we received from -- from the  
18 Georgia Department of Education.

19 Q Okay. And what was the timing for when you  
20 received that template?

21 A I don't remember the exact date; however, I  
22 want to say this was part of the strategic plan for GNETS  
23 development, so it would have been in that 2016/'17  
24 school year timeline or time frame.

25 Q And did you receive any instruction or guidance

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1 on how to create the plan --

2 A No.

3 Q -- besides the template?

4 A No.

5 Q Were all of the programs given the template?

6 A Yes, I believe we were all provided this same  
7 template.

8 Q And when you were provided with the template,  
9 was it your understanding that it was optional or  
10 mandatory that you use it?

11 A Mandatory.

12 Q Okay. All right. I'd like to walk through  
13 this document beginning with the first page that says  
14 Tier 1. And the first column -- well, actually, let's  
15 see.

16 So at the very top it says, "Tier I Prevention  
17 and Intervention Practices Available for All Students."  
18 What -- what does it mean where it says -- when it says  
19 overt behaviors in the next line?

20 A Externalizing behaviors, behaviors that you're  
21 able to observe.

22 Q And how is this information used? I'm just  
23 trying to understand the relevance of the listed  
24 behaviors here with Tier I.

25 A So those are -- are sort of guidance criteria



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1 to establish the range of overt and covert behaviors for  
2 a Tier I student.

3 Q Okay. Did you-all -- sorry.

4 Did South Metro GNETS program determine what  
5 behaviors would constitute the Tier I?

6 A So we established the criteria that you see  
7 there, the overt behaviors --

8 Q Uh-huh.

9 A -- and the -- the covert --

10 Q Okay.

11 A -- behaviors. So those criteria we sort of  
12 established for what would be reflective of a Tier I, II,  
13 or III student.

14 Q Okay. So the State DOE didn't specifically  
15 state that these behaviors constituted Tier I?

16 A No.

17 Q Okay. And then in this first column it says,  
18 "Evidence-based Prevention & Intervention Practices."

19 What are evidence-based intervention and  
20 prevention practices?

21 A Interventions practices and programs that have  
22 data to support effectiveness or outcomes.

23 Q Okay. So I'd like to walk through some -- at  
24 least some of the practices that you have listed in each  
25 of the tiers to make sure we have a better understanding

1 of how they operate in your program.

2 The first one listed here is Positive  
3 Behavioral Interventions and Supports, so PBIS. What is  
4 PBIS?

5 A Positive behavior intervention and supports is  
6 a framework to support positive student behavior through  
7 establishing and building positive cultures of  
8 expectations and standards that are building wide.

9 And so it essentially is just establishing sort  
10 of a positive climate and culture that's -- that's not  
11 really punitive in nature but really more focused on  
12 setting expectations that are positive in nature.

13 Q And it says the targeted students are all  
14 students in your program?

15 A Yes. With -- with Tier I, these -- all of  
16 these intervention practices and supports, services are  
17 available to all students. It's across the board.

18 Q And that's true for all of the practices on  
19 this page?

20 A On Tier I, yes.

21 Q Okay. So my understanding of PBIS, there is  
22 multiple tiers within PBIS. For what you have listed  
23 here, is this only referring to Tier I of PBIS or all  
24 tiers of PBIS?

25 A I'm not familiar with multiple tiers within

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1 PBIS.

2 Q Okay. So you're -- you're familiar with just  
3 one general framework that applies to all students?

4 A Yes, that's correct, the framework of what PBIS  
5 is.

6 Q So you're not aware that PBIS has progressive  
7 supports that increase as the student's need increases?

8 MS. JACKSON: Object to form.

9 THE WITNESS: No. Because, again, from my  
10 understanding, PBIS is a framework that is building wide,  
11 and it's not really an individual student support or  
12 intervention.

13 Q BY MS. HAMILTON: And the framework that you're  
14 applying at your school for PBIS primarily meets the  
15 needs of students in need of Tier I services?

16 A It -- it provides a -- a structure of  
17 expectations that is building wide for all students  
18 within the building as a Tier I intervention.

19 Q What would be an example of a -- of an  
20 intervention put in place through PBIS?

21 A So we have a behavioral matrix, and we engage  
22 our students on the three goals within the behavioral  
23 matrix. And so our matrix is be ready, be responsible,  
24 and be respectful.

25 And so then across settings within the building

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1 we have descriptors of what being ready, responsible, and  
2 respectful mean. The matrix has locations such as  
3 expectations in the hallway, expectations in the  
4 classroom, expectations in the cafeteria. And so it  
5 gives students an idea of what is expected in terms of  
6 their behavior in those areas.

7 Q It says here that all staff provide the PBIS  
8 support; is that correct?

9 A That's correct.

10 Q Who provided training to your staff on PBIS?

11 A We received training -- initially, we received  
12 training through GLRS and through our LEA. Clayton  
13 County has implemented PBIS for several years, and so we  
14 were initially trained at Ash Street in conjunction with  
15 the LEA. The same thing at Henry County. They  
16 participated in the PBIS training for the district.

17 Q Have you received any -- has your school  
18 received any training from the State DOE on PBIS?

19 A The GLRS is -- has supported -- GLRS and RESA  
20 have specialists who provides support in regards to the  
21 implementation. We have -- and I'm just trying to  
22 recall -- received support from DOE in regards to PBIS  
23 implementation in the context of -- and I saw it on  
24 here -- SWIS -- or maybe -- yeah, the School-Wide  
25 Information System. And so there are trainers from DOE

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1 who has provided us with training, professional learning  
2 and development on the SWIS platform and how to utilize  
3 the data within SWIS to identify target areas within the  
4 buildings or within the program, key times of day,  
5 certain locations where the data may reflect that there  
6 is a high number of referrals. And so that training came  
7 from the DOE.

8 Q Okay. And is the SWIS, School-Wide Information  
9 System, directly tied to PBIS?

10 A SWIS, I believe, is -- is -- yes, to answer  
11 your question. But I believe it's the platform that the  
12 national PBIS agency, whatever, that they utilize as sort  
13 of their data collection tool.

14 Q And just to confirm, the training that your  
15 staff have received on PBIS is training about the program  
16 that applies schoolwide to all students?

17 A Yes.

18 Q Does the State DOE require GNETS programs to  
19 implement PBIS?

20 A I think so. But we've -- we've been doing it  
21 for a while, and -- but it wasn't because of a mandate  
22 from DOE. But I think at this point and at this stage it  
23 is required that all GNETS programs implement PBIS.

24 Q All right. Another practice listed here is  
25 Trauma Informed Care & Practices. What -- what is that

1     referencing?

2           A     So one of the initiatives that Nakeba Rahming  
3     started was the Trauma Informed Care & Practices. And  
4     so, basically, that is professional development,  
5     professional learning opportunities for staff to  
6     understand the impact of trauma on children and students,  
7     to be able to operate from a position of awareness and  
8     knowledge of how trauma impacts children.

9           And so we initially -- that initiative  
10    initially started off with, as I was mentioning and  
11    discussing the importance of staff earlier, I think as a  
12    network we went through a two-year period where the focus  
13    from a trauma informs lens was really on self-care for  
14    staff because -- because of the work can be pretty  
15    intense at times, and to try to prevent burnout, prevent  
16    issues of staff experiencing distress themselves, we  
17    focused on trauma-informed care from a self-care  
18    perspective.

19           And so what that looks like or looked like for  
20    us is we facilitated monthly TIC meetings,  
21    trauma-informed care meetings with staff that was led by  
22    our trauma-informed care or TIC champion. And so that  
23    gave staff the opportunity to really sit and -- and  
24    formally discuss issues, concerns that they may be having  
25    just as it relates to doing therapeutic work.

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1 Q And you mentioned that Ms. Nakeba Rahming  
2 played a role in providing information about how to  
3 implement trauma-informed care and practices. What type  
4 of support did Ms. Rahming provide in her role with the  
5 State DOE?

6 A And so she secured external support, and I do  
7 not remember the name of the agency or the individual who  
8 was assigned to support GNET programs with  
9 trauma-informed care, but there was a one- or two-year  
10 period where DOE provided us with an external entity,  
11 agency, who -- who were experts in trauma-informed care.

12 And so they were working out sort of the plan  
13 for how to embed trauma care practices into GNETS, and so  
14 that included professional learning and development for  
15 the directors.

16 Q What was the time -- I know you said one- to  
17 two-year period. What was the time frame for when that  
18 one- to two-year period took place?

19 A Again, I believe that was -- that was more 2017  
20 to 2018, '19.

21 Q And you gave examples of the professional  
22 development that was provided for staff. Were there any  
23 resources that were provided on how to provide  
24 trauma-informed care practices for students?

25 A No.

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1 Q As a GNETS director, is that information that  
2 would be helpful to you and your staff?

3 A Can you say that again?

4 Q Sure.

5 A The previous part?

6 Q Sure.

7 So as a GNETS director, would it be helpful to  
8 receive support from the State DOE regarding  
9 trauma-informed care and practices for students?

10 A I think -- I would say yes. You know, anytime  
11 you give additional support and resources, it's always  
12 beneficial.

13 Q And then just to make sure I understand,  
14 because this -- I am looking at the Tier I chart.  
15 Trauma-informed care and practices is listed here as a  
16 practice for all students. What does that look like?

17 A Having staff that are aware and informed of how  
18 trauma impacts the students that they serve. And so  
19 having our staff being able to respond, interact, and  
20 work with our students from a trauma-informed lens.

21 And so for students, what that means is that  
22 they are engaged in working with staff who have been  
23 trained and have an understanding of -- of the impacts of  
24 trauma.

25 Q But to be clear, the training they received is



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1 not focused on student-specific needs related to  
2 trauma-informed care?

3 A Not student-specific, student-specific  
4 responses, but it really just more broadly in mindset and  
5 training. I think I mentioned earlier having a  
6 therapeutic mindset and disposition, and so that's what  
7 that means.

8 Q Okay. The next practice listed here, it says  
9 Behavior Crisis Interventions. Actually, that's a long  
10 title. And then it says Mindset Crisis Communication and  
11 Reflection and Focus Time (RAFT) -- R-A-F-T --  
12 Interventions. What is that referring to?

13 A So all of our staff are trained in Mindset, and  
14 part of my Mindset is the risk management system that  
15 train staff to be able to verbally de-escalate to  
16 inter -- intervene in crisis situations, and also it  
17 trains on proper techniques for restrain containments.

18 And so the crisis communication piece is what  
19 we focus on, because we want our staff to be skilled and  
20 to be able to verbally de-escalate crisis situations with  
21 students.

22 And then reflection and focus time is actually  
23 similar to Life Space Crisis Intervention, which that is  
24 a -- a one-on-one intervention provided for students to  
25 give them the opportunity in times of crisis to talk

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1 through a crisis, to become regulated and identify  
2 triggers, identify options of next time a student  
3 encounters a trigger of what they could do to better  
4 respond to the situation and not to sort of transition  
5 into a crisis.

6 Q Are any of those practices required by the  
7 State DOE?

8 A LSCI, which is -- RAFT and LSCI are the same  
9 thing. And so LSCI is one of those interventions that  
10 is -- I don't want to say required, but it is suggested  
11 from DOE that each program have individuals who are  
12 trained to be able to de-escalate and do individual  
13 interventions with students.

14 And so I don't know that it's necessarily a --  
15 a mandate or mandatory, but I do know that it is an  
16 ongoing and highly suggested practice for all programs.

17 Q What does LSCI stand for?

18 A Life Space Crisis Intervention.

19 Q Okay. And is that related to the Mindset  
20 crisis communication you're referring to or something  
21 different?

22 A Something different. LSCI is more related to  
23 reflection and focus time, or RAFT.

24 Q Is Mindset required by the State DOE?

25 A Yes.

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1 Q Who provides staff with the training on how to  
2 implement Mindset?

3 A Who provides the training? So each program  
4 should have their own trainers. So we have four  
5 trainers, certified trainers within our program. And so  
6 they conduct trainings throughout the school year,  
7 primarily during the beginning of the school year, to  
8 train everyone, recertify that everyone has been trained.  
9 And then throughout the year as we receive new staff,  
10 we're able to facilitate those trainings, and all GNET  
11 programs are able to do that.

12 Q And all of your staff have currently completed  
13 the Mindset training?

14 A Yes.

15 Q Have all of your staff received training in  
16 RAFT and LSCI?

17 A No. That is a more specific skill for -- for  
18 licensed certified staff. So for us, that means our  
19 social workers, our psychologists, and some key  
20 behavioral support individuals are trained in -- in doing  
21 RAFT and LSCI.

22 Q And it says here, so the staff trained in RAFT  
23 and LSCI will intervene to assist students in crisis. At  
24 the Tier I level, would -- would those interventions  
25 apply? So if a student is in crisis, would that still

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1 fall under a Tier I practice or intervention?

2 A Yes.

3 Q All right. Also on here is restorative  
4 practices and restorative circles. What is that  
5 referring to?

6 A A practice of when students have discipline --  
7 disciplinary infractions, instead of depending upon OSS  
8 as a -- as a way of addressing those infractions, the  
9 restorative circles are opportunities for students to  
10 take accountability to own certain behaviors in a -- in a  
11 group format to discuss whatever the event infraction  
12 might have been. And so that practice is utilized in  
13 lieu of OSS.

14 Q And here it looks like it can be used for all  
15 students, but it's more on an as-needed basis; is that  
16 correct?

17 A That's correct.

18 Q Are all of your staff trained in restor- -- the  
19 use of restorative circles?

20 A No. We only have select individuals who are  
21 trained to do that.

22 Q How are those individuals selected?

23 A Based on their role within the program. So if  
24 we have individuals who are behavior support team  
25 members, those are typically the -- the individuals who

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1 we identify to be trained in restorative practices.

2 Also social workers are a group within the  
3 program that we like to have facilitate those circles,  
4 and those -- those conversations within the circles.

5 Q Who provides those individuals with training?

6 A There are LEA -- much like Mindset, there are  
7 LEA opportunities, because restorative practices and  
8 circles are something that districts are now beginning to  
9 implement, and so we do engage either LEA for a training,  
10 and if LEA training is not available, our RESA provides  
11 support with training.

12 Q Does the State DOE require that the GNETS  
13 programs utilize restorative practices?

14 A Not to my knowledge.

15 Q And does the State DOE provide any training or  
16 resources related to restorative practices?

17 A I think in conjunction with the RESAs.

18 Q All right. Also another practice listed here,  
19 it says, "Social Emotional Learning (SEL) Instruction,"  
20 and then in parentheses it says "(ReThink Ed & School  
21 Connect/Second Step)".

22 What is this in reference to?

23 A So these are curricula that are used to do  
24 basic social emotional learning for students. ReThink Ed  
25 is the platform that Clayton County uses in -- in all of

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1 the schools, and then that School Connect/Second Step is  
2 the curriculum that Henry County uses.

3 Q And all of your GNETS students utilize those  
4 programs as well?

5 A Yes.

6 Q Or I should say curriculum.

7 How is this integrated into their school day?

8 A So for Ash Street -- well, in both centers  
9 there is a period during the morning where they have  
10 time. ReThink Ed is a computer-based platform where --  
11 where it has lessons and topics related to social and  
12 emotional functioning. And so our students are -- are  
13 required to engage in the platform at least four times a  
14 week. And so they're given a period of time during the  
15 day to kind of engage that -- that curriculum.

16 School Connect and Second Step is more of -- of  
17 a instructional tool where the teachers lead and  
18 facilitate lessons on -- lessons related to  
19 social/emotional concepts, topics and issues.

20 Q Also listed here it says therapeutic groups.  
21 What does that include?

22 A Facilitation of therapeutic groups by either  
23 our social workers or our GNET therapists. So they  
24 basically lead groups, group sessions.

25 Q How many social workers and therapists do you

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1 have on staff?

2 A So we currently have four social -- social  
3 workers and four therapists.

4 Q And practically, what does the provision of  
5 this group therapy actually look like in practice for  
6 your students? So it says all students get therapy,  
7 therapeutic groups?

8 A Yes. So, generally, what happens is a social  
9 worker or the therapist will pull a classroom of  
10 students, and we have a therapy room where they're able  
11 to go to the therapy room. There is furniture where  
12 they're able to sit and engage in topics of discussion  
13 related to whatever the therapeutic topic is for that day  
14 or the week.

15 Q And every student gets to partici- -- how  
16 frequently does every student get to participate in a  
17 therapeutic group?

18 A Weekly. Once a week.

19 Q So among those eight staff you just mentioned,  
20 they see all of the students in groups once a week?

21 A Yes. And the primary group of -- of staff that  
22 facilitate those are the social workers, but the  
23 therapists do have the capability and capacity to lead  
24 the thera- -- therapeutic groups. But the social workers  
25 are the main ones that -- that facilitate.

1 Q When during the school day do students  
2 participate in the therapeutics groups?

3 A It -- it's based on the classroom schedule, the  
4 social workers' availability, but it is a scheduled  
5 event. It's a standing schedule. It's built into their  
6 schedule.

7 Q Are they ever -- are the students ever pulled  
8 out of an academic core class?

9 A No.

10 Q When would be other times during the day when  
11 they would be able to do the therapeutic groups?

12 A It's built into their schedule, so it would be  
13 around the time where perhaps maybe we alternate one of  
14 the elective periods or some other time where it's not  
15 during core academic time.

16 Q And the last practice listed here says Music  
17 Therapy. What is music therapy?

18 A We have a -- a licensed music therapist, and  
19 she conducts and facilitate music therapy for -- for all  
20 students. They get to go to engage in music therapy with  
21 our -- with our licensed music therapist.

22 Q And how frequently do the students receive  
23 music therapy?

24 A I would say weekly.

25 Q Does this music therapist serve all of the



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1 students in the South Metro program regardless of the  
2 location?

3 A Yes.

4 Q So the therapist travels to the different  
5 sites?

6 A She travels. She has assigned days for Ash  
7 Street and also assigned days at J B Henderson.

8 Q Do you -- does your program use any data or  
9 metrics to determine whether these Tier I practices and  
10 interventions are effective?

11 MS. JACKSON: Object to form.

12 THE WITNESS: I think that is gauged -- no,  
13 specifically to any metrics designed to gauge the  
14 effectiveness of the practices, but we have other tools  
15 that we can utilize to determine student progress, so  
16 progress toward IEP goals and objectives.

17 The SDQ is one of those assessment tools that  
18 is administered as a pre- and posttest. So we're able to  
19 make determinations based on pre- and posttests, whether  
20 or not students have improved in areas, and, if so, how  
21 much they've improved. And so it gives us an idea of the  
22 development of their strengths as part of that -- that  
23 tool.

24 We also administer the BASC-3, which also  
25 provides information in regards to the functioning level

1 and certain categories based on that -- that tool.

2 Q And, for the record, when you say BASC-3, is  
3 that spelled B-A-S-C?

4 A That is an acronym.

5 Q BASC-3. Okay.

6 All right. I want to move on to the Tier II  
7 interventions, and that's on the next page. It says,  
8 "Tier II Interventions Provided to Moderate Risk Students  
9 By Subset or in Small Groups."

10 What's -- what -- what do you mean here or what  
11 does your program mean here by "Moderate Risk Students"?

12 A So based on the criteria of the overt -- overt  
13 behaviors and covert behaviors, those are students who  
14 are exhibiting or externalizing moderate levels based on  
15 the criteria that's stated there.

16 So students who are having to engage in four to  
17 seven RAFTs within a 40- -- 45-day period. Any students  
18 who have had any OSS days assigned.

19 So that criteria, basically, is just reflective  
20 of students who are exhibiting a higher level from Tier I  
21 students in terms of just what we're seeing in terms of  
22 them maybe having events of crises or events of behaviors  
23 that are significant.

24 Q And if your Tier I practices are provided to  
25 all of your students, what percent of your students are

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1 receiving Tier II services?

2 A I don't have a percentage, but if you could  
3 picture a pyramid, you know, obviously, the Tier I is  
4 sort of the foundational baseline, service supports that  
5 everyone receives. And so, ideally, the number of  
6 students in Tier II would be less than the number of  
7 students in Tier I.

8 Q Okay. And then these first two practices  
9 listed here, the behavior contracts and  
10 Check-In/Check-Out, can you speak briefly to what both of  
11 those are?

12 A So behavior contracts are specific individual  
13 contracts for students who may have -- may have  
14 demonstrated or exhibited behaviors that require a  
15 specific focus, such as maybe like elopement or  
16 disruptive behaviors within the classroom.

17 This -- because this document is actually from  
18 last school year, we -- we are not currently using the  
19 Check-In/Check-Out, but what that was, was that's part of  
20 the SWIS system, and it was a way of checking --  
21 providing information for -- in regards to students  
22 before and after class.

23 So a teacher would check in before a class was  
24 started and check out afterwards just -- to just kind of  
25 report how the student was feeling at the time, but

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1 that's not something that we currently utilize as part of  
2 the SWIS platform.

3 Q Why did your program discontinue use of the  
4 Check-In/Check-Out?

5 A Internally within the center it was -- it was  
6 difficult to do individual check-in/check-outs, and so it  
7 impacted our ability to transition from period to period.

8 Q Another practice listed here, it says  
9 Therapeutic Groups. How do the therapeutic groups in  
10 Tier II differ from the therapeutic groups offered in  
11 Tier I?

12 A If there are students who are encountering  
13 similar challenges or issues, the therapeutic groups in  
14 Tier II are more focused on specifics, specific areas  
15 that have been identified as needs, versus Tier I groups  
16 are more just general broad group topics.

17 Q Who oversees the therapeutic groups at the  
18 Tier II level?

19 A We have a lead psychologist who essentially is  
20 our clinical supervisor or coordinator, and so she  
21 oversees the entire clinical team from our social workers  
22 to our therapists, in all of our therapeutic components.

23 And so our social workers submit reports after  
24 each group session to just report basic information.  
25 They don't get into specifics of what people are saying,

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1 but they report levels of engagement, appropriate  
2 behavior, those type of things.

3 Q So who's actually participating in the  
4 therapeutic groups with the students? Is it the social  
5 workers?

6 A It's the social worker, yes.

7 Q Are these the same social workers who are also  
8 doing the Tier I therapeutic groups?

9 A Yes.

10 Q And I think you may have also mentioned that  
11 some of the therapists also provide the -- facilitate the  
12 therapeutic groups?

13 A My plan is to initially or to eventually have  
14 them facilitate more because they are clinical and  
15 they're licensed to do.

16 Our -- our social workers are -- some of our  
17 social workers are licensed, but that's not necessarily a  
18 requirement to be a school social worker. But the plan  
19 is to eventually have our GNET therapist to facilitate  
20 and lead our group sessions.

21 Q Okay. So, currently, it's the -- the social  
22 workers are leading the therapeutic groups?

23 A Yes.

24 Q And there are four of those --

25 A Yes.

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1 Q -- four social workers?

2 A Yes. Two per center.

3 Q Two per center.

4 And of those four, how many are actually  
5 licensed?

6 A We -- we just had a turnover this year. I -- I  
7 believe I still have either one or two who are licensed.

8 Q Of the total -- of the four total?

9 A Of the four, yeah.

10 Q And those groups meet weekly?

11 A Yes.

12 Q Okay. The last practice listed here under Tier  
13 II says South Metro GNETS Social Workers complete  
14 referrals to mental health providers for outside therapy  
15 and case management. What -- what is this referring to  
16 here?

17 A So we made -- even though we -- we have our own  
18 internal Wraparound and also therapy, therapeutic staff,  
19 we -- at Tier II, we will make referrals to other  
20 providers and agencies outside of our program.

21 Q And these referrals are based on the individual  
22 needs of the students --

23 A Yes.

24 Q -- in your program?

25 A Yes.

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1 Q Do the social workers make arrangements for the  
2 students to receive those services?

3 A What do you mean?

4 Q So the social workers are completing the  
5 referrals on behalf of the students?

6 A Yes.

7 Q Okay.

8 A And also with permission from the parents. So  
9 we not- -- the parents are notified that we're making a  
10 referral.

11 Q Okay. And these referrals, it says for outside  
12 therapy and case management. Are these services provided  
13 outside of the school day or as part of the school day?

14 A Generally, when we refer to outside agencies,  
15 they provide those services in the home, but, you know,  
16 obviously our -- our door is always open if they want to  
17 make a visit to the school and also provide the sessions  
18 in school. So we do provide that option, but we don't  
19 require or try to control where the services are  
20 provided.

21 Q All right. And I want to turn to the last  
22 tier, Tier III, which says, Tier III Individualized  
23 Interventions Provided to High-risk Students by Subsets  
24 or Individually.

25 What is the population of students receiving

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1 Tier III services?

2 A So that -- that's a smaller group of students.  
3 Those are just students who again, based on those overt  
4 and covert behaviors who -- who are exhibiting a high  
5 level of need of support based on the criteria that is  
6 established. And so the supports and interventions that  
7 are identified here, this tier level are just really  
8 designed to give them more intensive -- a more intensive  
9 level of support.

10 Q So this first practice says GNETS Circle of  
11 Support/Therapeutic Debriefing Meetings. What are --  
12 what are those meetings or circles?

13 A So --

14 MS. JACKSON: Object to form.

15 THE WITNESS: So circle of support is a -- is  
16 an approach designed by our student support services  
17 division in Clayton County, and so we've adopted the  
18 circle of support. And, essentially, that is all of key  
19 stakeholders within the school setting basically convene  
20 together as a team to discuss issues related to the  
21 student functioning, to identify potential resources,  
22 supports and solutions.

23 And so that circle support/therapeutic  
24 debriefing meeting is basically an opportunity when staff  
25 have identified that students are in Tier III, they have



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1 ongoing conversation and discussion about what the needs  
2 of that student may be.

3 Q BY MS. HAMILTON: And it says here these  
4 meetings take place monthly?

5 A Yes.

6 Q Is this circle of support/therapeutic  
7 debriefing meeting available to all of the students who  
8 are in Tier III?

9 A Yes.

10 Q Do you participate in those meetings?

11 A I do. I do sometimes. When I'm available, I  
12 do sit to hear student progress, to hear challenges, just  
13 to -- to be updated and informed on, you know, how -- how  
14 students are doing, and to also provide insight to the  
15 team about certain issues that may arise or certain  
16 things.

17 You know, I try to provide my experience and  
18 expertise to the team as they discuss any issues or -- or  
19 concerns or problems with individual students.

20 Q Also listed here is Intensive Therapeutic  
21 Support or ITS.

22 A Yes.

23 Q You've talked about that a bit today. But just  
24 to make sure I understand, that is provided by one of  
25 your licensed therapists?

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1 A Yes.

2 Q And how many therapists do you have?

3 A Four.

4 Q And they're all licensed?

5 A They are -- they are all credentialed to  
6 provide therapy. The licensure piece, that's -- I don't  
7 know -- I don't really want to say that because I don't  
8 know based on State standards, you know, but they all  
9 have the credential to be able to provide mental health  
10 services through View Point. And those are the  
11 individuals that we've contracted with View Point for.

12 Q Okay. Are all of the -- the students receiving  
13 Tier III services receiving ITS?

14 A No. We make it available to all of the Tier  
15 III students. However, some families have their own  
16 private provider that they want to continue services  
17 with. Some families just decline that service. That's a  
18 service that we -- we don't mandate or we can't mandate,  
19 and so we make it available to all Tier III students,  
20 but -- but not all families accept it.

21 Q Also listed here is a High Fidelity Wraparound.  
22 Is that the Wraparound program we were discussing  
23 earlier?

24 A Yes.

25 Q And then, lastly, it lists art and music

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1 therapy. Who provides the art therapy?

2 A We have a licensed art therapist on staff.

3 Q And does the art therapist only provide art  
4 therapy for Tier III students?

5 A Yes. She selects or we select or identify  
6 students who are Tier III who may be able to benefit from  
7 art therapy sessions.

8 Q How frequently do they receive the art therapy?

9 A It says weekly on here, but I don't know that  
10 it occurs weekly. It may be biweekly in some cases. It  
11 depends, I think, on the student.

12 Q And then for the music therapy here, is this  
13 the same music therapist who provides the Tier I music  
14 therapy?

15 A Yes.

16 Q What would be the difference between music  
17 therapy that's provided at Tier I as opposed to Tier III?

18 A She may meet individually with students or --  
19 or pull small groups of students to engage with in music  
20 therapy just based on, again, identified needs.

21 And that's similar to the -- the provisioning  
22 of the group sessions between Tier I and Tier II. The  
23 same thing here when we've identified sort of specific  
24 areas of focus, she will pull either individuals or small  
25 groups to focus on specific things.

1 Q Okay. So I know you mentioned the fact you're  
2 able to provide services through High Fidelity Wraparound  
3 through your contract with View Point Health. What  
4 other -- and I think you've mentioned View Point Health  
5 in connection with some of these other practices. How  
6 many contracts do you have with View Point Health?

7 A Well, we only have one current contract. We --  
8 if you remember earlier, we -- we now have bid High  
9 Fidelity Wraparound through our community parent liaison,  
10 so there is no longer any involvement with View Point on  
11 provisioning of those services. And so the only thing  
12 that we currently are contract- -- so we have one  
13 contract, and that's with them for those therapists.

14 Q Is that the Intensive Therapeutic Support?

15 A The ITS, yes.

16 Q And then similar to the question that I asked  
17 with regard to Tier I, for your Tier III interventions  
18 and practices, do you have any data or metrics to  
19 determine if your students are meeting their -- their --  
20 sorry -- to determine if your students are making  
21 progress?

22 MS. JACKSON: Object to form.

23 THE WITNESS: So -- so that would be the same  
24 response as previously. So SDQ and just sort of the BASC  
25 results and also just looking at the general performance.

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1 But I would say that with the ITS program, we  
2 actually started last year administering a progress  
3 monitoring tool that our lead psychologist found from  
4 Harvard School of Medicine, and it is a survey tool that  
5 we administer to students after each therapy session. So  
6 I'm speaking of ITS.

7 And so it -- it gives us a gauge on the  
8 internalizing features of their mental health status.  
9 So, basically, they report out on whether or not they  
10 feel that certain areas have improved. They basically  
11 are giving us an idea on how they feel internally.

12 We started that last year, and so we have data  
13 on that. This year we are actually starting to  
14 administer the survey to teachers and parents to get a  
15 better idea on the externalizing features of the  
16 behavior, and so that will give us a direct report on how  
17 effective ITS has been for -- for our students.

18 So right now we have data that we collected  
19 last year on internalizing features through that, and  
20 it's the fill-ins and behavior scale is what we  
21 administer, and -- and so we have data to kind of give us  
22 an idea on the internal features from the self-report  
23 from the student, but this year we're moving forward with  
24 administering that survey to -- to the caregivers, to the  
25 teachers so that we get an idea on how others view the

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1 student after having received therapy.

2 Q And, similarly, for Tier II, do you have any  
3 metrics in place to track student progress -- I should  
4 say to track the effectiveness of these interventions on  
5 student progress?

6 A Again, the -- the SDQ and BASC and overall  
7 general performance in general give us an idea of the  
8 effectiveness of sort of the services as a comprehensive  
9 package.

10 Q I know earlier when we were talking about the  
11 outpost or transition sites, we saw in the spreadsheet  
12 that there were students in the outpost at all of the  
13 different tiers, correct?

14 A There were, yes. From what we saw earlier,  
15 there were some Tier II and Tier III students in the  
16 outpost.

17 Q Okay. Of the Tier II services -- sorry.  
18 Of the Tier II services that are listed, are  
19 there any services here that are not provided in the  
20 outpost settings?

21 A No.

22 Q Okay. Of the Tier III practices listed on the  
23 next page, are there any practices that are not provided  
24 in your outpost or transition settings?

25 A We do not push in the individual art therapy

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1 sessions, and we also don't push in music therapy  
2 sessions, but everything else, the ITS, the -- the circle  
3 of support and Wraparound -- Wraparound are all available  
4 at Tier III.

5 Q Okay. And are all of the Tier I practices  
6 implemented in the outpost settings?

7 A Music therapy and also -- so music therapy  
8 would be the only one. And also -- I'm sorry.

9 So Tier I, we don't have control over in those  
10 transition sites. We're not -- we don't have control  
11 over training the entire building, so we couldn't train  
12 the Forest Park staff on PBIS or trauma-informed --  
13 trauma-informed care and practices, and so those aren't  
14 things that we are necessarily able to implement in the  
15 transition sites.

16 Also, we do use SWIS, the School-Wide  
17 Information System, and LiveSchool as data collection  
18 tools in the outpost or transition sites.

19 But, yeah, I would say the PBIS,  
20 trauma-informed care, and practices and music therapy are  
21 not really things that we're able to implement in the  
22 transition sites.

23 Q And it sounds like you're saying you're not  
24 able to require it. Are they practices that could be  
25 implemented if you had the support of the LEA or the

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1 school?

2 MS. JACKSON: Object to form.

3 THE WITNESS: If the school -- and I'll clarify  
4 with the PBIS. If the school is a PBIS school, then that  
5 obviously -- everyone in that building is trained through  
6 the LEA. So not all schools are PBIS schools, and so  
7 that kind of varies. And I'm trying to think. I know  
8 Morrow Middle School is a PBIS school. I don't know if  
9 Forest Park High School or Edmonds Elementary are PBIS  
10 schools.

11 Q BY MS. HAMILTON: Okay. When we were  
12 discussing the Tier I practices, you noted a few of these  
13 practices were required by the State DOE. Are there any  
14 Tier II practices that are required by the State DOE that  
15 you have listed here?

16 A No.

17 Q Are there any Tier III practices that are  
18 required by the State DOE that you have listed here?

19 A No.

20 Q Did your program previously have an ABA program  
21 with View Point Health?

22 A We did partner with them at one point for ABA  
23 therapy and support.

24 Q Do you know what ABA stands for?

25 A Applied Behavior Analysis.



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1 Q How long did you have that program in place?

2 A It did not last very long, maybe one school  
3 year, if -- if a complete school year.

4 Q Okay. And why was it not continued?

5 A They lost their therapist, the person who -- or  
6 their BCBA, the person who was assigned to View Point to  
7 do ABA therapy left, left that organization, and so they  
8 did not have a replacement for her.

9 Q Do you run into any other obstacles delivering  
10 therapeutic services to students in your programs?

11 MS. JACKSON: Object to form.

12 Q BY MS. HAMILTON: So, for example, you just  
13 mentioned there that the program providing services lost  
14 its therapist. Do you run into any other obstacles with  
15 delivering therapeutic services to students in your  
16 program?

17 A Other than, you know, staffing considerations  
18 or issues, no.

19 Our LEAs are supportive. They embrace what we  
20 do.

21 You know, I think we talked a little bit about  
22 that Tier III-wide, all students wouldn't receive ITS.  
23 With families declining the service, that's probably one  
24 of the biggest obstacles, is families not taking  
25 advantage of the services that we have.

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1 MS. HAMILTON: I'd like to ask the court  
2 reporter to mark this next document as Plaintiff's  
3 Exhibit 457.

4 (Plaintiff's Exhibit 457 was marked for  
5 identification.)

6 Q BY MS. HAMILTON: And the first page of this  
7 document is Bates stamp GA00262820. This is an e-mail  
8 chain from December 2020 through January 2021 between  
9 Derrick Gilchrist and Danté McKay with others copied. If  
10 you want to take a moment to look at it, let me know when  
11 you're finished.

12 A I'm fine.

13 Q Do you recognize this e-mail chain?

14 A Yes, I do.

15 Q I want to start by looking at the initial  
16 e-mail that you sent to Mr. McKay and to others on  
17 December 11th, 2020. Why did you send this initial  
18 e-mail?

19 A As I explained earlier, when we are talking  
20 about Monica Johnson, I had stated and I -- I guess I had  
21 the time -- the year wrong. No, I was right. I had  
22 attended the forum on mental health provisioning and  
23 provider -- for providers within the state, and we had  
24 been working for years. You know, we had been developing  
25 our programs and just developing what we felt like was a

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1 helpful approach.

2 And so I wanted to really connect with DBHDD to  
3 see if there was some kind of way that we could, you  
4 know, partner together, work together, to sort of -- I  
5 guess just partner together, you know, to provide  
6 services, and -- and collaborate together using...

7 And in the e-mail I -- I referenced the  
8 clubhouse model, and the reason why I reference clubhouse  
9 is because, you know, again, we're talking about two  
10 different agencies. And so with that, you know, there  
11 are specific criteria for certain things to -- to be  
12 providers. They had -- they had specific descriptions,  
13 requirements and criteria for a lot of the programs that  
14 were already in place, but when I reviewed the -- the  
15 State's manual, I noticed that there was not a  
16 description for clubhouse, and so that sort of led me to  
17 believe that there was some flexibility in terms of how  
18 they were looking at viewing and defining their clubhouse  
19 model, because they did not clearly define it for the  
20 public or for others to really know, okay, well, what is  
21 the clubhouse?

22 And so, you know, I just wanted to engage and  
23 enter into conversation about the clubhouse model and  
24 what that looked like and whether or not there were  
25 opportunities for GNET programs to sort of be inserted

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1 into their programs or programming.

2 And so I sent the e-mail just again just to  
3 kind of open and -- and have conversation again with --  
4 with the -- the -- the people at DBHDD.

5 Q Okay. What -- what is the clubhouse model?

6 A There was not a description provided, and so I  
7 think I arrived at later, after maybe talking with Danté,  
8 about kind of the clubhouse, and also with Chad Jones at  
9 View Point Health, that essentially the way they're  
10 operating clubhouses is that they are after-school  
11 programs or after-school kind of resource centers for  
12 children who were receiving services through DBHDD.

13 Q And these services would be funded by DBHDD?

14 A The clubhouses, I -- I don't know where funding  
15 for clubhouses. I don't -- I don't know how all of that  
16 works.

17 Q Okay.

18 A Yeah.

19 Q But you were reaching out to set up meetings to  
20 have discussions about starting this model?

21 MS. JACKSON: Object to form.

22 THE WITNESS: Really to gain a better  
23 understanding of what it was and to see if there were  
24 opportunities for us to kind of leverage what we were  
25 already doing in partnership with them or in partnering

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1 with them.

2 Q BY MS. HAMILTON: Okay. And just to make sure  
3 all of this comes together, so the meeting that you were  
4 trying to set up here, were you saying this is the  
5 meeting -- one of the meetings that you ultimately did  
6 have with Mr. McKay?

7 A Yes.

8 Q That we discussed earlier?

9 A Yes, and with his two coordinators.

10 Q And also earlier in the deposition you had  
11 mentioned that from those two meetings -- well, actually,  
12 I don't want to paraphrase your words. Did a clubhouse  
13 model ever get started as a result of those meetings?

14 A No.

15 Q Okay.

16 A No.

17 Q And it sounded like there -- there were not  
18 tangible -- any tangible plans that came out of those  
19 meetings?

20 A Yeah. No, there was nothing -- there was no  
21 formalized plan of next steps in terms of how to move  
22 forward with this. And so we -- we wanted to continue to  
23 the conversation, but there was nothing formal that --  
24 that came about.

25 Q Are there any therapeutic services that you

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1 wish you could offer to your students but cannot right  
2 now?

3 A No. With us adding equine this year, that was  
4 one of those things that, you know, I -- I wanted -- I  
5 want to add because I feel like it's -- it's beneficial,  
6 you know, for students.

7 But I think we currently as a program, we have  
8 capacity to deliver whether it be talk therapy through  
9 our therapists, art, music, equine.

10 I would like to find a play therapist. At one  
11 point we did have a play therapist on contract, but it's  
12 hard to find licensed play therapists. But I feel  
13 like -- and especially when you're talking about  
14 children.

15 And now I think the data of what we're seeing  
16 in terms of the impact of trauma on children and how it  
17 impacts their mental health and their mental well-being  
18 for younger children, play therapy would be a great tool,  
19 you know, to be able to support younger children.

20 Q Are there any other ways that State agencies,  
21 like the Department of Education and DBHDD, can further  
22 support your program when it comes to providing  
23 therapeutic services?

24 A You know, much like with us piloting that  
25 Wraparound program, I -- I think we've got to -- we have

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1 to pilot a different approach or an approach that  
2 includes all of the key stakeholders and agencies  
3 together. It's -- we've got to, you know, sort of roll  
4 up our sleeves and start doing the work on collaborating  
5 and working together for this wholistic approach because  
6 times have changed.

7 The -- the impacts of trauma on children are  
8 more widespread, and we -- we've got to be innovative and  
9 creative in the systems that we have to really support  
10 students and families.

11 So just the opportunity to -- to collaborate  
12 and work together.

13 Q How are you doing? Do you need a break?

14 A No, I'm fine.

15 Q You're good?

16 MS. HAMILTON: Do you need a break?

17 MS. JACKSON: I wanted to check on the time.

18 MS. HAMILTON: Okay.

19 THE VIDEOGRAPHER: We're at five minutes (sic)  
20 and 33 seconds. And I could use a quick bathroom break,  
21 if that's okay.

22 MS. HAMILTON: Why don't we go off the record  
23 and take a five-minute break.

24 THE VIDEOGRAPHER: Going off the record at  
25 4:24.

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1 (The deposition was at recess from 4:24 p.m. to  
2 4:32 p.m.)

3 THE VIDEOGRAPHER: We are back on the record at  
4 4:32.

5 Q BY MS. HAMILTON: Mr. Gilchrist, I have a few  
6 follow-up questions for you related to the contract that  
7 you have, the current contract that you have with View  
8 Point Health. And that's the contract for that ITS  
9 therapist services?

10 A Yes.

11 Q Okay. Is that a written contract?

12 A It is an MOU, yes.

13 Q How often is that contract renewed with View  
14 Point Health?

15 A Yearly.

16 Q How is that contract with View Point Health  
17 paid for?

18 A Using funds from the GNET grants.

19 Q Are any other sources of funding used to cover  
20 the expenses for the therapists?

21 A No.

22 Q Okay. So Medicaid funding is not used?

23 A No, not -- not on my behalf.

24 Q Okay. All right. Who determines the staffing  
25 needs in your GNETS program?



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1           A    Instructional staff or therapeutic or just  
2   staff in general?

3           Q    Staff in general.

4           A    I -- I -- pretty much based on our total number  
5   of students served and also kind of loose projections of  
6   what I see happening within both LEAs help me to  
7   determine how many teachers, how many paraprofessionals  
8   we might need.

9                   Also, there are criteria that I think are kind  
10   of as guidance in terms of per student how many staff we  
11   should carry.

12          Q    Who provides those criteria?

13          A    It was -- it -- it's not something that is  
14   provided like on a yearly basis. I just remember when I  
15   first became a director in 2013 there were just some --  
16   some guiding criteria that I received from a document  
17   from DOE, and I've -- I've been searching for it to -- to  
18   find it, but I can't find it to kind of help me, and so  
19   I'm basically just operating off of memory.

20          Q    How involved is the State DOE in your decisions  
21   related to hiring?

22          A    They're not involved at all.

23          Q    And beyond the guidelines that you mentioned  
24   you received when you first became a GNETS director, you  
25   haven't received any written guidelines from the State

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1 DOE?

2 A No.

3 MS. HAMILTON: I'd like the court reporter to  
4 mark this next document as Plaintiff's Exhibit 458.

5 (Plaintiff's Exhibit 458 was marked for  
6 identification.)

7 Q BY MS. HAMILTON: And the first page of this  
8 document is Bates stamp GA00785867. This is an e-mail  
9 chain from March to April 2017. The initial e-mails at  
10 the end are between you and Lisa Domzal with a subject  
11 line of PT Psychologist, and the remaining e-mails are  
12 between you and Ms. Rahming with a similar subject line.

13 If you want to take a moment to take a look and  
14 let me know when you're finished.

15 A I'm fine.

16 Q Okay. Do you recognize these e-mails?

17 A Yes.

18 Q Who is Lisa Domzal? And I'm going to spell her  
19 last name, D-o-m-z-a-l.

20 A She is -- I believe her title is Position  
21 Control Coordinator in Clayton County.

22 Q Okay.

23 A And so she is part of the human -- human  
24 resources department for Clayton County, which is our  
25 fiscal agent.

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1 Q And what were you asking her in these e-mails?

2 A So for Lisa, the initial request was for us to  
3 be able to post and hire a part-time school psychologist,  
4 she wanted me to confirm with DOE that I could do that.

5 Q All right. And in her response, the  
6 confirmation -- I just want to confirm. The confirmation  
7 that she was looking for was -- do you see -- this is the  
8 Monday, March 27th e-mail --

9 A Okay.

10 Q -- from Ms. Domzal to Derrick Gilchrist.

11 A Yes.

12 Q Okay. So in her e-mail, she wanted you to  
13 provide a State-level e-mail or document showing that you  
14 had been approved to put the position in your budget; is  
15 that correct?

16 MS. JACKSON: Object to form.

17 THE WITNESS: I...

18 Q BY MS. HAMILTON: What was the -- what was the  
19 form? Sorry. What was the documentation that she wanted  
20 you to provide?

21 A This e-mail. She wanted to see approval or  
22 authorization from the State that it was okay for me to  
23 hire a part-time psychologist. And I don't think that --  
24 and I'm trying to remember. I -- I don't believe the  
25 issue was necessarily about the funds or funding. It was

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1 the fact that it was a part-time position, not a  
2 full-time psychologist.

3 Q Did you reach out to anyone from the State DOE  
4 to get this confirmation?

5 A Nakeba Rahming.

6 Q And what did you ask Ms. Rahming?

7 A Whether or not I was authorized or approved to  
8 add a part-time psychologist.

9 Q Did you ultimately get approval from  
10 Ms. Rahming?

11 A I believe we -- we did, but we never filled the  
12 position because we could not find anyone to take a  
13 part-time school psychologist position, and so instead I  
14 ended up adding a full-time second psychologist.

15 Q Okay.

16 A Who is still currently employed. So we still  
17 currently have two psychologists.

18 Q Have you had to reach out to the State DOE for  
19 approval for any other GNETS positions?

20 A No. And the only reason why I did this is  
21 because the human resources department wanted me to,  
22 which I didn't really understand why they wanted me to  
23 reach out.

24 MS. HAMILTON: Okay. I am handing the court  
25 reporter what I'd like to have marked as Plaintiff's

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1 Exhibit 459.

2 (Plaintiff's Exhibit 459 was marked for  
3 identification.)

4 Q BY MS. HAMILTON: This is a document that was  
5 produced by the South Metro GNETS program in response to  
6 the United States subpoena. It was provided in response  
7 to the United States request for a copy of South Metro's  
8 GNETS grant application for fiscal year '22. We received  
9 this document from your program, but the grant  
10 application pages were produced as separate documents.  
11 So all -- what I have here is the staffing pattern  
12 portion.

13 A Okay.

14 Q If you want to take a moment to look at it and  
15 let me know when you're ready.

16 A I'm fine.

17 Q Mr. Gilchrist, are you familiar with this  
18 document?

19 A Yes.

20 Q Am I correct that this is an excerpt from the  
21 South Metro GNETS grant application for fiscal year 2022?

22 A Yes.

23 Q And does this part of the application pertain  
24 to staffing?

25 A Yes.

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1 Q All right. I have a few clarifying questions  
2 to make sure I am reading this document correctly.

3 With regard to timing, this state -- this  
4 information is included in the fiscal year '22 grant  
5 application, correct?

6 A That's correct.

7 Q Does that mean that the data here about  
8 staffing pertains to your staffing numbers as of the 2021  
9 to '22 school year?

10 A Yes. It's the projected staffing for school  
11 year '21/'22.

12 Q Are the projections based on your numbers from  
13 the prior school year?

14 A From the previous school year and also any  
15 projected needs based on anticipated needs.

16 Q Okay. Okay. So to confirm, the numbers that  
17 we'll be looking at in this document are based on what  
18 you project you will need -- you would need for the 2021  
19 to 2022 school year?

20 A Yes.

21 Q Okay. How much do the projections tend to  
22 change?

23 A I mean, they do change, but I'm not sure how to  
24 kind of quantify, you know, how much or -- you know,  
25 what -- what those changes are, but there are changes

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1 from year to year based on what we project in terms of  
2 needs.

3 Q Based on your recollection of your actual needs  
4 during the '21/'22 school year, were these accurate  
5 projections?

6 A These are -- these are accurate projections.

7 However, for example, I mentioned in January we  
8 added Joi Whitaker-Wilson as a community parent liaison  
9 in January, and so that was something that I did not  
10 initially kind of anticipate. And like, I don't see  
11 that -- that listed here.

12 But, you know, in general, we -- we try to  
13 project as accurately as possible, you know, kind of what  
14 we'll need.

15 Q Okay. And then I want to make sure I  
16 understand the sources of funding that you're noting here  
17 are available for staffing at the top of the chart.

18 One of the categories listed here says State  
19 Grant. What State grant is this referring to?

20 A The State allocation for GNETS.

21 Q Okay. And this is the State GNETS grant you  
22 were discussing earlier?

23 A Yes.

24 Q Is that an annual grant?

25 A Yes.

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1 Q And then next it says Federal VI-B. What  
2 funding source is this referring to?

3 A That's the federal GNETS, the federal GNETS  
4 grant.

5 Q I'm sorry?

6 A The federal GNETS grant.

7 Q And then the last source of funding listed  
8 here, it says LEA Funded. What is this referring to?

9 A Positions that are funded by the local  
10 education agency.

11 Q Can GNETS staff positions be funded through any  
12 other sources of funding?

13 A Can they be?

14 Q Are they funded by any other sources of  
15 funding?

16 A Not to my knowledge. Not to my knowledge.

17 Q Okay. All right. And then I also want to look  
18 at, if you look at the second column that says Staff  
19 Type, there are a few different categories of staff that  
20 are listed. It says existing staff. It says no --  
21 sorry, new, n-e-w, staff, and then there are some that  
22 are blank. What's -- what does this mean when it says  
23 existing staff?

24 A Those were positions that were -- were  
25 previously existing within the program. So those --



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1 those positions essentially carried over from the  
2 previous fiscal year.

3 Q Okay. What is the reference to "new staff"?

4 A Positions that are -- are new to the current or  
5 to the upcoming fiscal year.

6 Q And what do the blank spaces mean?

7 A That no information is recorded, and that is  
8 just an error.

9 Q So, like, let's look at -- near the bottom of  
10 the first page, it says GNETS social worker, and it looks  
11 like you have listed here two people who are funded  
12 through the State grant as GNETS social workers --

13 A Um-hum.

14 Q -- but there's nothing listed in terms of what  
15 type of staff they are.

16 A Right. Those were existing.

17 Q Okay. So if there is nothing listed there,  
18 they would be existing?

19 A I would say yes as a default, but it also could  
20 be that that was a new position, but...

21 And even in looking at these numbers, there is  
22 an error, because as I stated before, we have four GNETS  
23 social workers, and for some reason there is only two  
24 showing here.

25 Q So there is a few different entries for GNETS

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1 social workers?

2 A Okay. All right. So that would explain.

3 Okay. I'm only seeing...

4 Q Though, if I'm reading it correctly, and please  
5 tell me if I'm reading this correctly, it looks like  
6 earlier in this chart it says GNETS social worker  
7 existing staff, and it says four.

8 A Yeah, okay.

9 Q And then further down it says GNETS social  
10 worker, but it doesn't say what type of staff they are,  
11 but then it says two more people?

12 A So that may be an error, because the previous  
13 line where it says GNETS social workers existing staff,  
14 four, that's actually reflective of what we have. I'm  
15 not sure -- GNETS social worker, that line item, I'm not  
16 sure what -- what or why that's there.

17 Q Okay. Would those be vacant positions?

18 MS. JACKSON: Object to form.

19 THE WITNESS: They could be vacant positions.

20 Q BY MS. HAMILTON: As part of your projections  
21 in the GNETS grant application, can you include positions  
22 that don't currently exist?

23 A That don't exist, what do you mean?

24 Q So you said you had four -- you did -- you had  
25 four social workers. Could you -- like as part of your

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1 grant application in making projections include more than  
2 those four?

3 A Perhaps if we project, then maybe there might  
4 be a need to add additional people.

5 Q Okay. So based on your projections for your  
6 student support services for fiscal year '21 -- sorry,  
7 for the '21/'22 school year, how many school psychologist  
8 positions --

9 A Two.

10 Q -- did you have? Did you have? Okay.

11 How many -- and I guess you were just saying  
12 you had four -- you projected that you needed four social  
13 worker positions?

14 A Well, we had four actual social workers.

15 Q Okay.

16 A That were existing or returning.

17 Q Okay. For fiscal year 2022, how many  
18 counselors did you have?

19 A Two.

20 Q Okay. How many special education specialists  
21 did you have?

22 A There were four.

23 Q How many nurses did you have?

24 A One.

25 Q And this says new staff. Was this an actual

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1 position that was filled that year?

2 A It was a position that was filled, but it  
3 should have been an existing -- an existing position and  
4 maybe I put "new staff," because it wasn't the same  
5 person. We had to replace our healthcare tech.

6 THE REPORTER: Healthcare what?

7 THE WITNESS: Healthcare technician.

8 Q BY MS. HAMILTON: And how many behavior  
9 interventionists did you have?

10 A Just one.

11 Q Okay. What would determine whether the source  
12 of funding for the individuals who are on your staff?

13 MS. JACKSON: Object to form.

14 THE WITNESS: Well, there are positions, so,  
15 like, for example, the LEA-funded positions, those are  
16 positions that I make a request from the LEA for and that  
17 they fund. And then as I -- as I build sort of our  
18 projections and our staffing for the next year, we  
19 basically take what our allocation may be, and we assign  
20 staff based on the funds that are available.

21 And so, in general, I try to fund the teachers  
22 from my State grant. A lot of our teachers, social  
23 workers, and -- and those type of positions I try to fund  
24 from the State grant, and then we try to use -- utilize  
25 our federal funds for paraprofessionals, classified

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1 staff.

2 Q BY MS. HAMILTON: Of the positions that we just  
3 walked through, have there been any changes in the number  
4 of staff who were employed for the 2022 to '23 school  
5 year?

6 A We don't have as many teachers this year.

7 Q Sorry. We haven't gotten to teachers yet.

8 A I'm sorry.

9 Q Of the student support services?

10 A I'm sorry. Are there any changes?

11 Q Uh-huh.

12 A No.

13 Q All right. So turning to teachers, if you turn  
14 to the next page, this lists what your program had  
15 included in your grant application, but how many teachers  
16 were employed by the South Metro GNETS program for the  
17 school year 2022?

18 A 17. Hold on. I'm sorry. 18.

19 Q And there is one row here that says GNETS  
20 teacher grant funded, but similar to before, there is  
21 nothing left -- listed in the staff type column. It has  
22 three -- three more teachers that are listed.

23 MS. JACKSON: Object to form.

24 Q BY MS. HAMILTON: And I'm just trying to make  
25 sense of whether these are actually teachers.

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1 A Or vacant positions?

2 Q Or vacant positions.

3 A We have started each of the past few years with  
4 vacant positions or carried vacancies throughout the  
5 school year and not been able to hire certified teachers,  
6 and so I would just kind of conclude, based on what I am  
7 looking at, those line items where there is not an  
8 indication of the staff type, if there is nothing there  
9 that those were vacant positions or vacant individuals  
10 who were included into the -- the grant application for  
11 the program, to be filled as needed.

12 Q Okay. And has that number changed for the 2022  
13 to '23 school year?

14 A We -- we -- we do have fewer teachers because  
15 the number of students has declined or decreased, but we  
16 did project a -- a reduced need for the number of  
17 teachers, and I'm trying to count in my head. So I think  
18 that number was reduced by two, so this year we actually  
19 only have 16 teachers.

20 Q Okay. And then similarly for your  
21 paraprofessionals for the fiscal year 2022, how many did  
22 you have?

23 A 21.

24 Q And does that include the teachers where there  
25 are -- sorry -- the paraprofessionals where there is no

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1 staff type?

2 A Yes.

3 Q Okay. So if those weren't included, then it  
4 would be 19?

5 A Yes.

6 Q Okay. And how does that number compare to the  
7 number of current paraprofessionals who you have for the  
8 current 2022 to '23 school year?

9 A It's the same. We did not reduce the number of  
10 paraprofessionals. We carried the same number of  
11 paraprofessionals.

12 Q And would it be accurate to say that most of  
13 the GNETS teacher positions are funded through the State  
14 grant?

15 A Yes.

16 Q And the only other one -- I think on the first  
17 page it mentions the school secretary and clerks, but the  
18 last one I want to talk about here at the bottom of the  
19 page, it says administrators, director of GNETS program.  
20 Is this your position as GNETS director?

21 A Yes.

22 Q Okay. And there's just one position, correct?

23 A Yes.

24 Q What is the source of funding for your  
25 position?

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1 A I am paid from the State grant.

2 Q For the teachers who are employed in the GNETS  
3 program, are there any professional qualifications or  
4 certifications that they must meet?

5 A The teachers with -- within all GNETS programs  
6 are required to meet the PQ, professionally qualified  
7 standards that are established by the State.

8 Q Do all of the teachers who are employed in your  
9 GNETS program currently meet those requirements?

10 A Not -- we have a few teachers who are working  
11 to earn full certification. We do have those teachers  
12 who are provisionally certified, but they all have  
13 certification.

14 Q How many teachers are provisionally certified?

15 A I don't know. Without having that directly in  
16 front of me, I don't know which teachers have what  
17 credential or which certification. I would have to look  
18 at that or look that up.

19 Q But you said there are a few?

20 A Yes.

21 Q What about your social worker positions? What  
22 type of certification or qualifications are they required  
23 to have?

24 A They have to be certified as a school social  
25 worker.



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1 Q What does that entail?

2 A Compliance with Professional Standards  
3 Commission standards for school social workers.

4 Q Do you know if they have to have a certain  
5 degree level to be a school social worker?

6 A I believe it requires master level degree, but  
7 I'm not sure, you know, exactly on what the PSE  
8 requirements are.

9 Our HR department vets all of our staff for  
10 that matter, not just social workers, but they make sure  
11 they meet standards and requirements that are established  
12 by the PSC.

13 Q And what does PSC stand for again?

14 A Professional Standards Commission.

15 Q And that's through the State, correct?

16 A Yes. It's C, PSC.

17 Q Do all of your social workers meet the --  
18 currently meet the Professional Standards Commission's  
19 standards?

20 A Yes.

21 Q Are there standards that are set by the  
22 Professional Standards Commission that apply to  
23 therapists who serve in schools?

24 A Therapists, to -- to my knowledge, you know,  
25 again, we're talking about the sort of inner agency

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1 collaboration, that's -- to my knowledge, that's not a  
2 certification level that PSC handles. Therapists are  
3 required by whatever that governing body is to meet  
4 licensure standards, so that's a separate board or entity  
5 from PSC.

6 Q Are paraprofessionals required to meet  
7 standards that are set by the Professional Standards  
8 Commission?

9 A Yes. All paraprofessionals are required to  
10 obtain and hold a certification as a paraprofessional  
11 through the Georgia Professional Standards Commission.

12 Q Okay. Do all of the paraprofessionals who work  
13 for the South Metro GNETS program hold that  
14 certification?

15 A Yes.

16 Q And I just want to walk through some of these  
17 other positions that we talked through earlier.

18 The school psychologists that work through the  
19 GNETS program, are they all -- do they all have the  
20 certifications required to -- to teach as set by the  
21 State -- I'm sorry, not to teach -- to provide psych- --  
22 psychological services?

23 A Yes. They are all certified as school  
24 psychologists.

25 Q And then similarly for the counselors who work

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1 for the GNETS program, do they all have the required  
2 certification to serve in your program?

3 A Yes. They are all required to be certified as  
4 school counselors.

5 Q And I'm not sure if I know what a special  
6 education specialist does. What -- what is a special  
7 education specialist?

8 A So those are the other program leaders, and I'm  
9 not sure why it's -- it's reflected here under student  
10 support services and not administrators, but those are  
11 the coordinating supervisors that we talked about before.

12 Q Okay. Do they have to have a specific  
13 certification for their roles?

14 A They're -- they are required to be certified  
15 as -- or required to be certified in educational  
16 leadership.

17 Q Okay. Do they all have that certification?

18 A Yes.

19 Q And what qualifications, or should I say what  
20 certifications does the behavior interventionist need in  
21 their role?

22 A Now that, I think, would vary based on LEAs and  
23 what their requirements are for behavior  
24 interventionists.

25 For our program, the requirement is that the

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1 individual is certified in an area of education, whether  
2 that be social work, school counselor, school  
3 psychologist, but they must hold school certification or  
4 PSC certification.

5 Q And does that person hold that certification?

6 A Yes.

7 Q Switching gears, are you familiar with the  
8 GNETS rule that went into effect in July -- July 5th,  
9 2017?

10 A Yes.

11 Q How did you become familiar with the GNETS  
12 rule?

13 A I don't remember if it was an e-mail or if  
14 there was a meeting or training to update us on the new  
15 rule.

16 Q Did you receive guidance in some form from the  
17 State DOE about the GNETS role?

18 A Yes, I believe so.

19 Q And you don't remember the form of that  
20 guidance?

21 A I don't. I don't remember again if it was an  
22 e-mail or a training. It may have been in a -- in a  
23 training or in a meeting.

24 Q And what is the relevance of the GNETS role to  
25 your role as a GNETS director?

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1           A    It -- it helps us to work with our LEAs to  
2   ensure that there are processes in place for placing  
3   students in GNET programs or placing students in a  
4   position to receive GNET services.

5           MS. HAMILTON: I'm handing the court reporter a  
6   document that I'd like to have marked as Plaintiff's  
7   Exhibit 460.

8           (Patient's Exhibit 460 was marked for  
9   identification.)

10          Q    BY MS. HAMILTON: The first page of this  
11   document is Bates-stamped GA00030538. This document has  
12   a cover e-mail dated August 2018 between Vickie Cleveland  
13   and Lakesha Stevenson with a subject line, "Items to copy  
14   for meeting." And then there are five attachments that  
15   include various -- various GNETS program documents. And  
16   I actually want to focus our time on the attachments.

17          I will give you a moment just to skim through,  
18   and you can let me know when you're done.

19          A    Okay.

20          Q    All right. What I'd like to do first is just  
21   gauge your familiarity with these documents, and then if  
22   we have time at the end of the deposition, we may come  
23   back and talk more about the substance.

24          If you can turn to the second attachment which  
25   has the Bates state -- stamp number GA00030542. And the

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1 title of this document says, "Request for GNETS  
2 Consultation."

3 A Yes.

4 Q Are you familiar with this document?

5 A Yes.

6 Q What is it?

7 A It's a -- a document that can be used by LEAs  
8 to request GNETS consult for students.

9 Q Who created this document?

10 A The DOE.

11 Q Okay. And in your capacity as a GNETS  
12 director, did you play any role assisting in the creation  
13 of this document?

14 A No.

15 Q Does the South Metro program use the Request  
16 for GNETS Consultation form?

17 A Yes.

18 Q Are all GNETS programs required to use this  
19 form?

20 MS. JACKSON: Object to the form.

21 THE WITNESS: I -- I don't know.

22 Q BY MS. HAMILTON: And how did you learn of this  
23 form?

24 A We had a meeting, and I would imagine this -- a  
25 meeting agenda. I was present when this information was

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1 shared.

2 Q How long have you been using the request for  
3 GNETS consultation form?

4 A Based on these documents, I would say probably  
5 since the time of this meeting in 2018.

6 Q Okay. I'd like to turn to the next document,  
7 and this is the one that has the title GNETS Services  
8 Flow Chart. And it's the next attachment in this  
9 document.

10 A Gotcha.

11 Q With a Bates stamp of GA00030544.

12 A Yes.

13 Q Are you familiar with this document?

14 A Yes.

15 Q What is this document?

16 A It's a guidance document to help LEAs and all  
17 stake -- stakeholders understand just the flow, a  
18 flowchart in terms of, I guess, how to request  
19 consultation and how to handle other issues or processes.

20 Q Okay. Who created this document?

21 A I believe someone at the DOE.

22 Q Does your program use this GNETS services  
23 flowchart?

24 A We use a -- a -- a modified form of it, and so  
25 it looks a little bit different from this.

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1 Q What parts of the flowchart look different in  
2 what you're using in your program?

3 A Well, we wanted to be specific for our LEA, so  
4 like position titles we wanted to use the correct  
5 position titles that are aligned with what our LEAs are  
6 so that they would be clear on the people within the  
7 district and what their role is in terms of requesting  
8 consult. And so we just kind of modified it based on  
9 more locally specific position titles and staff.

10 Q Okay. When were you first introduced to the  
11 GNETS Services Flow Chart?

12 A I would say at this meeting.

13 Q And just to confirm, so that our record is  
14 clear, are you referring to this August 21st, 2018 --

15 A Yes.

16 Q -- GNETS director meeting?

17 A Yes.

18 Q Okay. All right. I want to turn to the next  
19 attachment. It has a Bates number of GA00030545, and the  
20 title is Confidential Student Information Packet.

21 Are you familiar with this document?

22 A Yes.

23 Q What is this document?

24 A It's the -- a student information packet, a  
25 student information packet that LEAs could request



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1 support or assistance.

2 Q Okay. And who created this document?

3 A I believe someone at the DOE.

4 Q Does the South Metro program use the  
5 confidential student information packet?

6 A Yes.

7 Q And do you use it as it's currently written or  
8 did you make any modifications?

9 A We -- we did -- I believe we did modify -- no,  
10 we did not make any modifications to this.

11 Q Okay. And when were you introduced to this  
12 document?

13 A During this August 2018 meeting.

14 Q And I'd like to turn to the last attachment.  
15 This is -- starts on GA00030549 entitled Guiding  
16 Questions for Consideration of Services. Are you  
17 familiar with this document?

18 A Yes.

19 Q What is this document?

20 A A guiding questions document to help and assist  
21 LEAs with complying with the requirements and process for  
22 requesting support or assistance for students.

23 Q Does the South Metro program use this form in  
24 connection with students being referred to your program?

25 A Yes, we do.

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1 Q And when did -- when did you first get  
2 introduced to the guiding questions?

3 A In this August of 2018 meeting.

4 Q And did your program make any modifications to  
5 this form?

6 A No.

7 Q All right. I want to turn back to the  
8 flowchart that's in this packet of documents. I want to  
9 ask you a few questions about how this process works for  
10 a student beginning through a GNETS program.

11 So if you can look at the part of the flowchart  
12 that focuses on the standard process. Based on this  
13 chart and your understanding of how students get placed  
14 in GNETS, who makes the initial determination regarding  
15 whether a student should be considered for GNETS?

16 A Well, it was my understanding that the special  
17 ed departments with -- within the LEAs make a  
18 determination with students that they may be struggling  
19 with or they may have questions about, and from that  
20 point they may reach out to GNETS programs to request  
21 assistance or support.

22 Q Okay. So then going down to this -- so then  
23 after that first step, it says, the student information  
24 packet is completed. Is that the confidential info- --  
25 confidential student information packet that we just saw?

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1 A Yes.

2 Q Okay. So after that step, it says GNETS  
3 coordinator and sped director meet to discuss packet  
4 information. What does that meeting entail?

5 A And so that's one of the things that we kind of  
6 modified for our program. Our -- our sped directors and  
7 both of our LEAs did not meet with South Metro staff to  
8 discuss packet information, and so that -- that step  
9 doesn't necessarily apply for us.

10 Q So after the special education director  
11 completes the packet, what would be the next step in the  
12 process in South Metro?

13 A And -- and also, I would say that generally in  
14 the two LEAs I serve, special ed directors aren't  
15 completing the packets. It's generally the school staff,  
16 the teacher, along with perhaps a coordinator, behavioral  
17 coordinator in both counties, and also any other  
18 school -- school-based staff would be the individuals who  
19 sort of prepare the packets for consideration.

20 Q Okay.

21 A And for us, once they've completed a packet and  
22 prepared information, including all of the required  
23 pieces, such as a current FBA/BIP, current site  
24 eligibility report, and also supporting data, that  
25 information is then given to us. We have a person in our

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1 student review team. We call it student review, and  
2 those packets are provided to our student review  
3 specialists. She reviews it to make sure that it has all  
4 of the required components. And then, you know, we -- we  
5 look at it, review it, make sure everything is there, and  
6 then we'll set up an IEP meeting.

7 And then from there, it's left up to the IEP  
8 team to make a determination, you know, whether or not  
9 the student is appropriate for GNETS.

10 Q And just to make sure I understand this.  
11 Student review specialist, is that a stand-alone position  
12 in the GNETS -- in the South Metro GNETS program?

13 A It is one of our positions.

14 Q Okay. Was that one of the positions among the  
15 ones that we just walked through?

16 A Uh-huh. It's actually -- it's listed as a  
17 teacher, a certified teacher, and so her role is to  
18 operate as the student review specialist. And so she  
19 again receives the -- the packets or the requests for  
20 assistance. She reviews it just to make sure that all of  
21 the required -- required components are there, and if  
22 they have the required components, we confirm for them  
23 that they have everything that is required to even have a  
24 conversation about a GNETS placement.

25 And so then at -- at that point a meeting is

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1 then set up for an IEP team meeting to convene and to  
2 discuss whether or not that team feels like a GNET  
3 placement is appropriate.

4 Q And this person who's -- sorry -- the student  
5 review specialist who's reviewing the materials, how do  
6 they know what the requirements are for a student to be  
7 in GNETS?

8 A It's on -- it's in the checklist.

9 Q Okay. So they are walking through the  
10 checklist --

11 A Yes.

12 Q -- to determine whether --

13 A Yes. Everything is present in -- in the --  
14 what do you call it -- the confidential student  
15 information packet.

16 Q If they discover or determine something is  
17 missing, what would they do?

18 A Let the -- let the LEA know that they're  
19 missing a required component to even have a discussion  
20 about GNETS.

21 Q Can the student review specialist reject a  
22 referral independently?

23 A It's -- it's not a -- a matter of accepting or  
24 rejecting. It's just a matter of confirming whether or  
25 not they have all the components.

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1           So she can notify them that they're missing  
2     some components, and then by rule, the student isn't  
3     eligible to be considered for GNETS.

4           Q    Has your student review specialist reviewed  
5     packets of materials for students who -- whose packets  
6     were incomplete?

7           A    Yes.

8           Q    Do you or anyone else on your staff review  
9     those packets before she sends them back to the LEA?

10          A    No. She reviews them with me to let me know  
11     whether or not all of the -- all of the components are --  
12     are present or not. If they're not, she just notifies me  
13     that she received the -- a packet that was not complete,  
14     and she provides that communication to the LEA that they  
15     are missing whatever, whatever it is that's not there.

16          Q    Have you ever agreed that a student's packet  
17     should move forward to the IEP team when any materials  
18     are missing?

19          A    Not when -- not when there are missing  
20     components, no.

21          Q    All right. So once the materials are complete  
22     and the IEP meeting is scheduled, who from your staff  
23     participates in the meeting?

24          A    Program administrator, classroom teacher,  
25     social worker, and the student review specialist.

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1 Q And by "program administrator," who would that  
2 include?

3 A Coordinating supervisors, site administrator.

4 Q I know earlier you mentioned that you don't  
5 regularly participate in IEP meetings. Do you ever  
6 participate in IEP meetings?

7 A No.

8 Q Do you or anyone on your staff have to approve  
9 the decision for a student to be admitted to your GNETS  
10 program?

11 MS. JACKSON: Object to form.

12 Q BY MS. HAMILTON: Do you have to approve the  
13 decision for a student to be admitted to your GNETS  
14 program?

15 A No. The IEP team is the final decision-maker  
16 on student placement into GNETS, so whatever the IEP team  
17 determines is what stands.

18 Q Have you ever been presented with a situation  
19 where the IEP team determined a student should be placed  
20 in your program but you determined the student's  
21 placement was inappropriate?

22 A Not initially. There are times where the IEP  
23 team does make a recommendation that a student is  
24 appropriate for GNETS, and so then after a period of time  
25 of serving the student, we've had our psych- --

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1 psychologists conduct testing and it be determined at --  
2 at that point in time that the student, based on the  
3 psychological assessment, may not be appropriate for  
4 GNETS.

5 Q Under those circumstances, what then happened?

6 A We notified the LEA of the psychological  
7 eligibility results, and we collaborate to work to place  
8 the student in another program within the LEA.

9 Q Was the determination that GNETS was not the  
10 least restrictive environment for that student?

11 A No. Many times it is that the student is  
12 diagnosed as being conduct disorder, oppositional defiant  
13 disorder, or having some other social maladjustment that  
14 does not respond and is not appropriate for therapeutic  
15 programming, because the profile for those type of  
16 children is that their behavior is not necessarily a  
17 function of a mental health issue. It's more a function  
18 of choices and decision and just a general social  
19 maladjustment.

20 Q And so in those situations, you -- your program  
21 is not suited to meet the needs of those students?

22 A That's correct.

23 Q Are there any other scenarios that you've  
24 encountered where, for example, the IEP team has  
25 determined the student should be admitted but your staff



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1 determined the student didn't meet the eligibility  
2 criteria for GNETS?

3 A I think that was the scenario I just kind of  
4 described.

5 Q All right. But are there any others besides  
6 the conduct disorder situation?

7 A No.

8 Q All right. If you want to look at the "Move  
9 In" column on the flowchart, and it says, "Student moved  
10 in" -- well, I guess, what -- what is -- what is -- what  
11 is this -- what is the "Move In" column referring to?

12 A So students who are -- who have moved into the  
13 LEA from either out of state or from a long-term  
14 hospitalization or residential treatment.

15 Q And for students who are coming from one of  
16 those programs, what is the process that South Metro uses  
17 to determine whether to provide services?

18 A So we -- South Metro does not make a  
19 determination on whether to provide services. We review  
20 the information from the LEA that may be provided to us  
21 when a student moves in. We provide them with feedback  
22 in regards to our research.

23 So, for example, if a student moves in to  
24 our -- either of our LEAs from another state, we'll  
25 review the state records from the -- the -- from the

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1 state that the student is coming from, and we'll provide  
2 the LEA with any research that we may have discovered.

3 So for our student review specialist, what  
4 she'll do is, is she'll reach out to the program in the  
5 state where the student is coming from to gather more  
6 information to make a determination on whether or not,  
7 you know, it's similar to GNETS or the equivalent to  
8 GNETS. We'll provide them with any feedback or  
9 information that we receive from -- from the school or  
10 program, and then they will call an IEP meeting to make a  
11 determination on which placement would be most  
12 appropriate.

13 Q All right. I want to switch gears now and ask  
14 you some questions about the GNETS strategic plan. What  
15 is the GNETS strategic plan?

16 A It was a guidance document that was intended to  
17 provide a framework of expectations for all GNET  
18 programs, a framework to help guide programming for all  
19 GNET programs, and it was, you know, essentially, a  
20 guidance that was intended to help all GNET programs in  
21 the state to sort of be on the same page in terms of  
22 programming.

23 Q And at the beginning of our deposition, you  
24 mentioned that you were a member of the strategic  
25 planning committee; is that correct?

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1 A Yes.

2 Q How did you end up serving on that committee?

3 A Ms. Rahming -- Dr. Rahming asked if there were  
4 GNET directors who were interested in assisting and  
5 helping, and I volunteered.

6 Q As a member of that committee, did you provide  
7 feedback on drafts of the strategic plan?

8 A Yes.

9 Q What other responsibilities did you have as a  
10 strategic plan committee member?

11 A We provided our input in terms of areas of  
12 focus and what -- what we felt or believed to be best  
13 practices for operating a therapeutic program.

14 Q What was your opinion of the final work product  
15 that you-all produced?

16 A Initially, it -- it was something that we felt  
17 like or it was something that I felt like was needed,  
18 because prior to that there was not really a framework  
19 for programs to really have as a road map.

20 However, after years of implementation, you  
21 know, there were some areas that could have been better,  
22 could have been better developed or designed.

23 And I think at the last revision, I don't know  
24 who or how the revision took place. I think the last  
25 revision addressed some of the areas that needed to be

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1 clarified or specified.

2 Q What were some of those areas that you felt  
3 prior to that last revision needed to be clarified?

4 A That's a tough one. I'd have to look at them  
5 side by side just to kind of remember specifically what  
6 those revisions were.

7 I do know that the areas of the GNET program,  
8 some of the areas were combined, and so it was just -- it  
9 was -- I felt like the -- the latest or the current  
10 version is just more streamlined and more clear.

11 MS. HAMILTON: Okay. I'm handing the court  
12 reporter a document that I would like to have marked as  
13 Plaintiff's Exhibit 461.

14 (Plaintiff's Exhibit 461 was marked for  
15 identification.)

16 Q BY MS. HAMILTON: This document has a title of  
17 "Self-Assessment Outcomes and Improvement Summary Plan."  
18 This was provided to the United States by the South Metro  
19 GNETS program in response to the United States subpoena.

20 Mr. Gilchrist, do you recognize this document?

21 A Yes.

22 Q All right. What is this?

23 A This is the self-assessment that all programs  
24 are required to complete as a self-assessment of -- of  
25 our implementation of the strategic plan.

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1 Q When you served on the strategic plan  
2 committee, did you play any role in creating the  
3 Self-Assessment Outcomes and Improvement Summary Plan?

4 A I don't remember that as part of what we did on  
5 that committee, but I do know with the final product that  
6 the -- and this is actually not the format or the  
7 template, because I can never get it to work on the  
8 actual formal one, so I just kind of used that -- that  
9 template just to create something that I could type in.

10 But I do know that this form or document was  
11 included as part of the final strategic plan.

12 Q Okay. And just to confirm what you were just  
13 saying, this is not a copy of the actual plan?

14 A Correct.

15 Q Okay. Does it contain the information that is  
16 part of the plan?

17 A Yes.

18 Q Okay. But you modified it for what reason?

19 A Just so I can have it in Word document and I  
20 can like type -- type in the boxes and enter the data.

21 Q Okay. How are you as a GNETS director expected  
22 to use the Self-Assessment Outcome and Improvement  
23 Summary Plan?

24 A Its -- its main purpose is to inform areas that  
25 we may need to focus on to improve our program as it

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1 relates to the strategic plan. And so with -- with  
2 engaging in the self-assessment activity, we gather just  
3 information from the perspective of program leaders on  
4 areas that we either may be doing really well in or areas  
5 that we may need to focus on.

6 Q And does the State DOE require every GNETS  
7 program to complete a similar plan?

8 A Yes, it's -- it's required.

9 Q Would you -- once you have completed this plan,  
10 who -- who do you give it to from -- let me rephrase that  
11 question.

12 Once you've completed this plan, who -- who  
13 from the State do you give it to?

14 A It's part of the grant application. It's one  
15 of those documents that we submit with our grant  
16 application.

17 Q Do you also have to complete a midyear  
18 strategic plan self-assessment?

19 A This is the midyear (indicating).

20 Q Okay. So how many of these self-assessments do  
21 you complete during --

22 A Two.

23 Q -- the school year?

24 A Two. A midyear and end of year.

25 Q Once you provide this information to the State

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1 DOE, how do they use this information?

2 MS. JACKSON: Objection to form.

3 THE WITNESS: I don't know.

4 Q BY MS. HAMILTON: Are site visits part of the  
5 strategic plan process? And I should say site visits  
6 from the State DOE?

7 A It was initially part of the original plan  
8 where the DOE would annually visit each GNET program to  
9 review the artifacts in evidence to support  
10 implementation of the strategic plan.

11 Q Does the State DOE still conduct site visits?

12 A They conduct site visits. However, it's on a  
13 rotating scheduled basis. It's not an annual site visit  
14 as it relates to the strategic plan.

15 Q Okay. How frequently does the State DOE now  
16 conduct site visits as part of the strategic plan  
17 process?

18 A I don't remember the number of years in the  
19 rotation because I was -- that's pretty new, so I  
20 don't -- I don't remember.

21 Q Okay. But it's -- but to confirm, it's not  
22 every school year?

23 A Yes, it's not every school year.

24 Q Are you aware of any changes that are being  
25 made to the strategic plan process for the current school

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1 year?

2 A No, I'm not aware of anything.

3 Q Do you anticipate receiving feedback from the  
4 State on the strategic plan documents when you submit  
5 them?

6 A Yes.

7 Q Earlier during the deposition you mentioned  
8 that you met Wina Low during one of the DOJ site visits;  
9 is that correct?

10 A No, that was Shaun.

11 Q Or was that Shaun Owen --

12 A Yes.

13 Q -- that you met?

14 A Who was on-site during the site visits.

15 Q All right. Thank you for clarifying that.

16 Were you present -- how many of the site visits  
17 were -- did you attend that were conducted by the United  
18 States?

19 A For my program?

20 Q Yes.

21 A I attended all of them. The -- I take that  
22 back. So they had to make -- in Henry County they made  
23 two trips last year. I was not present for the second  
24 because it was a scheduling conflict.

25 Q Okay.



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1 A But I was present for both visits in the -- in  
2 the fall, one to Ash Street and one to J B Henderson.

3 Q Okay. And were you present for the visit in  
4 the spring?

5 A I was not.

6 Q That was the one you weren't present for.  
7 Okay.

8 How did you learn of the site inspections that  
9 the United States planned to conduct?

10 A I believe I was issued a subpoena.

11 Q Did you do anything to prepare for those site  
12 inspections?

13 A No.

14 Q Do you recall having any conversations with  
15 anyone on your staff about the visit in advance of them  
16 taking place?

17 A No.

18 Q Did you notify your staff that the United  
19 States would be conducting site inspections prior to  
20 their arrival -- to the arrival of the DOJ staff?

21 A No.

22 Q Did you modify any classroom schedules in  
23 connection with the United States' site inspection?

24 A No.

25 Q Did you place any maintenance request

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1 immediate -- immediately and in advance of the United  
2 States' inspection?

3 A No.

4 Q Did you have any conversations with your  
5 students and families about the United States' visit  
6 prior to it taking place?

7 A No.

8 Q Did anyone on your staff have any conversations  
9 with your students and families about the United States'  
10 visit in advance of the visit?

11 A Not --

12 MS. JACKSON: Objection to form.

13 THE WITNESS: Not to my knowledge, because I  
14 did not make my staff aware. So there was no knowledge  
15 for them to be able to communicate to either families or  
16 students.

17 Q BY MS. HAMILTON: Okay. So, to be clear, you  
18 had not notified your staff that the United States would  
19 be conducting visits in advance?

20 A No.

21 Q Did you have any conversations with anyone  
22 representing the State DOE about site visit -- about the  
23 United States' site visits before they occurred?

24 A Can you say that again?

25 Q Did you have any conversations with anyone

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1 representing the State DOE about the United States' site  
2 visits?

3 A No.

4 Q Actually, let me finish that.

5 Did you have any conversations with anyone  
6 representing the State DOE about the United States' site  
7 visits before the visits occurred?

8 A No.

9 Q Okay. Did you have any conversations with  
10 anyone representing the State about the United States'  
11 site visits after the visits occurred?

12 A Can you say that again?

13 Q Uh-huh. Did you have any conversations with  
14 anyone representing the State about the United States'  
15 site visits after the visits occurred?

16 A No.

17 Q Did you have any conversations with any of the  
18 State DOE personnel who were in attendance at these site  
19 visits after the visits occurred?

20 A No.

21 MS. JACKSON: How are we on time?

22 THE VIDEOGRAPHER: 6 hours and 54 minutes.

23 MS. JACKSON: Okay.

24 Q BY MS. HAMILTON: In 2017, Mr. Gilchrist, your  
25 program received a facility conditions assessment for one

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1 or more -- for one of your facilities, correct?

2 A What is that? Could you tell me a little bit  
3 more about it?

4 Q Sure.

5 And, actually, let me reframe it.

6 Have you -- do you recall receiving a facility  
7 conditions assessment from the State DOE about the  
8 condi- -- the physical condition of any of your  
9 facilities?

10 A I don't remember receiving any report like that  
11 from DOE.

12 MS. HAMILTON: Can we go off the record?

13 THE VIDEOGRAPHER: Sure. Going off the record  
14 at 5:54.

15 (A discussion was held off the record.)

16 THE VIDEOGRAPHER: Back on the record at 5:55.

17 (Plaintiff's Exhibit 462 was marked for  
18 identification.)

19 Q BY MS. HAMILTON: I am showing a document that  
20 I would like the court reporter to mark as Plaintiff's  
21 Exhibit 462, and this document has a Bates stamp, first  
22 page, GA00995478. It's an e-mail chain between Derrick  
23 Gilchrist and Michael Rowland from August 2017.

24 If you want to take a moment to look at it.

25 Let me know when you're finished.

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1 A Okay.

2 Q And let me make sure you have control. Are you  
3 able to move the mouse?

4 A Yes.

5 Q Okay. Is it working?

6 A It is. I'm trying to move the little square so  
7 I can see the -- the whole thing. Okay.

8 Q Do you recognize this -- this e-mail chain?

9 A I -- I see it. I don't remember it, no. And I  
10 vaguely recall the exchange.

11 Q So Michael Rowland had reached out to your  
12 program with regard to one of your facilities; is that  
13 correct?

14 A That's correct.

15 Q And in response, you replied that you were  
16 providing an updated report addressing the improvement  
17 items?

18 A Yes.

19 Q Okay. And that was with respect to the Ash  
20 Street Center?

21 A That's correct.

22 Q So does this indicate that the State DOE had  
23 identified issues with the Ash Street Center facility?

24 A Based on this, yes, it seems as if they did an  
25 inspection, identified changes that need to be made. The

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1 LEA addressed the upgrades or changes that needed to be  
2 made, and a report was submitted back to Mike Rowland  
3 outlining or detailing the recommendations that they had  
4 made and how the LEA had addressed those.

5 Q Okay. Has the State Department of Education  
6 identified any other facility issues since conducting  
7 this assessment in 2017?

8 A No, not to my knowledge.

9 MS. HAMILTON: And how much time do we have  
10 left?

11 THE VIDEOGRAPHER: Six hours, 59 minutes and 15  
12 seconds.

13 MS. HAMILTON: Okay. I think we can wrap up.

14 Mr. Gilchrist, thank you so much for your time  
15 today. Let me stop sharing my computer screen. The  
16 United States is finished with our questioning. I don't  
17 know if the State wants to say anything.

18 MR. PICO-PRATS: Yes. Good evening,  
19 Mr. Gilchrist. You have reached seven hours. What did  
20 you say? Sorry?

21 THE WITNESS: I didn't say anything. I'm  
22 sorry.

23 MR. PICO-PRATS: You reached seven hours, and I  
24 spoke about this with your counsel before, but I have  
25 very few questions, maybe 20 minutes max. If you want to

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1 keep going we can, or if you want to reconvene for  
2 another day and do 20 minutes, it's really up to you.

3 THE WITNESS: I'm okay to continue.

4 MR. PICO-PRATS: Okay. So it will be brief.

5 THE VIDEOGRAPHER: One second. I just want  
6 to -- I want to move this microphone.

7 MR. PICO-PRATS: Are we back on the record?

8 THE VIDEOGRAPHER: You are on the record right  
9 now. One second.

10 Okay. We are good. Thank you.

11  
12 EXAMINATION

13 BY MR. PICO-PRATS:

14 Q Great. So, Mr. Gilchrist, who hired you in the  
15 County?

16 A You said who hired me in the County?

17 Q Yes.

18 A I -- for -- for my current position of  
19 director, I interviewed with a panel of individuals who  
20 represented each of the LEAs that were being served by  
21 South Metro. And so at the time, there were  
22 representatives from Atlanta Public Schools, Fulton  
23 County Schools, and also Clayton County. And so I was  
24 selected -- and so I was selected by that committee of  
25 individuals to be director.

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1 Q All of the members of the panel were local  
2 representatives. They weren't part of the state of  
3 Georgia?

4 A No. They were all part of -- of the three LEAs  
5 that were served by South Metro.

6 Q Earlier today we talked a little bit about  
7 funding, and I just have a few questions in regards to  
8 the funding for GNETS.

9 Can you give an explanation of how GNETS  
10 funded, to your knowledge, at least their program?

11 A Well, to my knowledge or -- or for South Metro,  
12 we're funded based on the number of students that we  
13 serve.

14 Q And where does the funding come from?

15 A What do you mean?

16 Q Where is the money coming from for you to be  
17 able to pay per student?

18 A If I understand, it -- it comes from the State.

19 Q Okay. It comes from -- you mentioned a grant  
20 before. Does it come from the grant?

21 A Yes.

22 Q So is the funding that you use for your program  
23 completely from the grant?

24 A Well, the LEAs contribute through the positions  
25 that they are funded. We've reviewed the document



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1 earlier to indicate or reflect a funding source for all  
2 the positions, and so additional funds are contributed  
3 from the LEAs in the form of positions and staff.

4 Q Who do you report to in your current position?

5 A I report to the Division of Student Support  
6 Services in Clayton County.

7 Q Is it a specific person or is it a group of  
8 people?

9 A It's -- Dr. Sandra Nunez is the chief of the  
10 Division of Student Support Services. That is -- that is  
11 who completes my evaluation.

12 Q Okay. And you spoke about evaluations before.  
13 Who in your staff completes evaluations?

14 A I'm sorry, say it again.

15 Q Who all in your staff completes evaluations?

16 A Evaluations of staff?

17 Q The evaluation you just mentioned, yes, for the  
18 program.

19 A Our program leaders. So those coordinating  
20 supervisors and site administrator, they complete the  
21 evaluation for all of the staff within our program.

22 Q Those are the only ones on your staff that  
23 would complete evaluations?

24 A In addition to myself. I also evaluate staff  
25 within the program.

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1 Q And they -- your staff members will turn in the  
2 evaluations to you, correct?

3 A No. We utilize the TKES and LKES platform, and  
4 so all of the evaluations are actually entered into that  
5 platform. Any paper evaluations for classified staff,  
6 those are submitted to our human resources department  
7 in -- in the LEA.

8 So in Clayton they go to the Clayton County  
9 human resources department, and in Henry County they go  
10 to the Henry County department of human resources.

11 Q Do you know if those are ever forwarded to the  
12 State?

13 A I'm not aware. I -- I don't think they are  
14 forwarded to the State.

15 Q You mentioned the -- the IEP plans, and I just  
16 want to get a better understanding of how the IEP team is  
17 comprised. Who all makes up the IEP team?

18 A So you have a special ed representative, a  
19 regular ed representative, administrators and other  
20 designated individuals in addition to parents and any  
21 other service -- related service provider or stakeholder  
22 that has a -- a -- a role in supporting the student.

23 Q Do you know if there is any member of the State  
24 present in the IEP team?

25 (Court reporter clarification.)

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1 THE WITNESS: No, the State does not attend IEP  
2 meetings.

3 Q BY MR. PICO-PRATS: And they are not members of  
4 the IEP team, correct?

5 A That is correct.

6 Q Are you aware of any instance in which the  
7 State participated in a decision for a student to receive  
8 GNETS services?

9 A No, I am not.

10 Q Are you aware of any instance in which the  
11 State compelled your program to make a particular  
12 decision regarding a student's placement?

13 A No.

14 Q Has the State ever encouraged you to keep a  
15 student in GNETS when their IEP recommended otherwise?

16 A No.

17 Q Does the State participate in your program's  
18 personnel division?

19 A No.

20 Q I just have two follow-up questions based on  
21 questions you were asked, and I think that will be it.

22 When you spoke about your meeting with Danté  
23 McKay or how you originally reached out to him, and my  
24 question surrounding that is, were you the one to  
25 originally reach out to Danté or did Danté reach out to

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1 you?

2 A I reached out to Danté.

3 Q And so DBHDD, have they ever reached out to you  
4 before that?

5 A No.

6 Q And then the last bit here is, you spoke about  
7 speaking with Nakeba Rahming in relation to the High  
8 Fidelity Wraparound program, and the Department of  
9 Justice asked the questions relating to DOE expressing  
10 interest in relation to the program. Do you remember  
11 that?

12 A Do I remember her question?

13 Q Yes.

14 A I -- yes. There have been so many questions, I  
15 think I remember it. I remember that one.

16 Q Do you remember Ms. Nakeba Rahming asking you  
17 about the High Fidelity Wraparound program or High  
18 Fidelity Wraparound?

19 A I -- I don't remember her specifically asking  
20 me about it.

21 Q Did she express interest in it?

22 MS. JACKSON: Objection to form.

23 THE WITNESS: I -- I believe that was  
24 documented in the e-mail correspondence that she did  
25 express interest.

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1 Q BY MR. PICO-PRATS: Do you know if the interest  
2 was from her personally or from her on behalf of the  
3 Department of Education?

4 MS. JACKSON: Objection to form.

5 THE WITNESS: No, I don't know.

6 MR. PICO-PRATS: That's all the questions I  
7 have today. Thank you very much, sir.

8 THE VIDEOGRAPHER: Going off the record at  
9 6:11. This concludes the deposition.

10 THE COURT REPORTER: Did you need a rough  
11 draft, Javier?

12 MR. PICO-PRATS: Yes, please.

13 MS. JACKSON: Yes, please.

14 (The deposition concluded at 6:11 p.m.)  
15  
16  
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## CERTIFICATE OF REPORTER

STATE OF GEORGIA       )  
                                      )  
COUNTY OF DEKALB       )

I, Marcella Daughtry, a Certified Reporter in the State of Georgia and State of California, do hereby certify that the foregoing deposition was taken before me in the County of DeKalb, State of Georgia; that an oath or affirmation was duly administered to the witness, DERRICK GILCHRIST; that the questions propounded to the witness and the answers of the witness thereto were taken down by me in shorthand and thereafter reduced to typewriting; that the transcript is a full, true and accurate record of the proceeding, all done to the best of my skill and ability;

The witness herein, DERRICK GILCHRIST, has requested signature.

I FURTHER CERTIFY that I am in no way related to any of the parties nor am I in any way interested in the outcome hereof.

IN WITNESS WHEREOF, I have set my hand in my office in the County of DeKalb, State of Georgia, this 11th day of October, 2022.



Marcella Daughtry, RPR, RMR  
GA License No. 6595-1471-3597-5424  
California CSR No. 14315

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3 DECLARATION UNDER PENALTY OF PERJURY

5 I declare under penalty of perjury that I  
6 have read the entire transcript of my deposition taken in  
7 the above-captioned matter or the same has been read to  
8 me, and the same is true and accurate, save and except  
9 for changes and/or corrections, if any, as indicated by  
10 me on the DEPOSITION ERRATA SHEET hereof, with the  
11 understanding that I offer these changes as if still  
12 under oath.

14 Signed on the \_\_\_\_\_ day  
15 of \_\_\_\_\_ 20\_\_.

19 \_\_\_\_\_  
20 DERRICK GILCHRIST

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DERRICK GILCHRIST

Signature: \_\_\_\_\_



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